Ontario

OFFICE OF THE WORKER ADVISER

BUSINESS PLAN

2017-18 to 2019-20

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EXECUTIVE SUMMARY

This executive summary deals with the Office of the Worker Adviser's (OWA) two programs: workplace insurance and occupational health and safety reprisals (OHSRP).

Workplace Insurance Program

The OWA's major mandate is advising and representing vulnerable, non-unionized injured workers and their survivors in their workplace safety and insurance claims and appeals. The highest priority for the planning period is contributing to caseload reduction at the Workplace Safety Insurance Appeals Tribunal (WSIAT). Significant progress was made in 2016-17, with a reduction in OWA's WSIAT inventory of 17.3% from a year earlier. Resources will be focused on enabling OWA to accept more WSIAT hearings in 2017-18 and beyond. At the same time, OWA will ensure that it can continue to immediately accept urgent and priority cases such as occupational cancers, severely disabled workers and workers in psychological or financial crisis. 190 of these cases are projected for 2017-18, similar to 2016-17 and 56% more than the 2015-16 level. This higher level is projected to continue for the period covered by this plan. OWA will work with its referral partners to ensure that high priority cases continue to be accepted in a timely fashion.

This plan contains a comprehensive multi-facetted strategy to focus resources on WSIAT caseload reduction. This includes working with WSIAT and employer and worker community partners on early and alternative dispute resolution and other improvements in the appeals system such as video hearings. OWA's new service delivery model, fully implemented in 2016-17, includes rigorous initial case reviews to ensure that only cases with a reasonable chance of success will be appealed. This will divert around 43% of new cases from the appeal system, with extensive supports for these workers to access alternative sources of support.

The plan includes significant learning and mentoring supports to OWA's staff to equip them to succeed in a changing operating environment. Risk mitigation strategies have been developed to ensure that the plan stays on track.

Occupational Health and Safety Reprisals Program (OHSRP)

Effective April 1, 2012, the OWA was given an additional mandate under the *Occupational Health and Safety Act:* to advise, educate and represent non-unionized workers who have suffered reprisals in the workplace for raising health and safety concerns. There was a significant growth in service demand from 2012-13 to 2013-14 and into 2014-15. As a result, in 2014-15, OWA shifted resources from its workplace insurance program to the OHSRP. As of March 31, 2017, service demand for 2016-17 and into 2017-18 was on track to return to 2014-15 levels, meaning that resource levels for OHSRP are adequate.

AGENCY MANDATE

OWA is an operational service agency reporting to the Minister of Labour. The OWA Director is appointed by an Order in Council and its employees are public servants.

The OWA's vision is to be a leader in advice, representation, and education in workplace safety and insurance and occupational health and safety reprisals, on behalf of vulnerable non-unionized injured workers and their survivors.

Workplace Insurance Mandate - Section 176(1) of the WSIA establishes the OWA's mandate to "educate, advise and represent workers who are not members of a trade union and their survivors". The OWA supports the government's goal to create a more prosperous and healthy Ontario by contributing to poverty reduction by supporting vulnerable workers through dispute resolution, enabling clients to access benefits and services under the WSIA. This reduces the pressure on social services programs and helps employers by contributing to effective and timely dispute resolution of potentially costly litigation. Supporting injured workers in return to work contributes to Ontario's prosperity by maximizing disabled employment, reducing claims and health costs for these workers.

Occupational Health and Safety Reprisals mandate - Pursuant to s. 50.1 of the *Occupational Health and Safety Act* (OHSA) and O. Reg. 33/12, the OWA is mandated to educate, advise and represent non-unionized workers who have reprisal complaints under Section 50 of the OHSA. The OWA's OHSA mandate supports the following Ministry of Labour priorities: protecting vulnerable workers, protecting

workers' health and safety and leading accident prevention efforts, enhancing a culture of health and safety across Ontario and accelerating the transformation of Ontario's occupational health and safety system as recommended by the Expert Advisory Panel.

OVERVIEW OF PROGRAMS AND ACTIVITIES

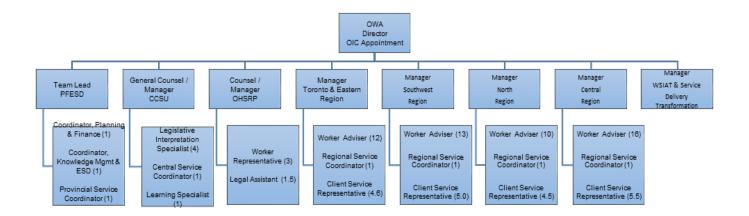
Workplace Safety and Insurance Program – This program is delivered to nonunionized injured workers and surviving family members by 51 Worker Advisers and 19.5 Client Services Representatives from 16 offices across Ontario, by toll free telephone service and through OWA's website. OWA staff travel to meet disabled clients and attend hearings and mediations as required. Information Clinics are held in communities where there is no local OWA office. Complex legal advice, education and representation are provided by 4 Legislative Interpretation Specialists and OWA's General Counsel.

- Advisory Services All workers who contact the OWA for assistance receive information and advice to help them navigate the system on their own. This is provided by telephone, email, website enquiries, letters, community information clinics and in-person appointments.
- **Representation Services** When advisory service is not sufficient to help workers resolve their problems on their own, OWA provides representation at WSIB, WSIAT and in other related proceedings such as return to work or judicial review. Whenever possible, OWA seeks early and alternative resolution of disputes. OWA reviews all cases before offering representation, accepting only cases that have a reasonable chance of success. This results in diverting around 43% of cases from the appeals system. Referrals are then made to the appropriate social agency or disability program.
- Educational Services provided through OWA's website, printed educational materials and educational sessions in person or by webinar. The website contains information on WSIB benefits and services, worker information kits, frequently asked questions and links to WSIB and WSIAT forms. OWA supports its community partners who provide peer support, counselling and assistance to injured workers.

Occupational Health and Safety Reprisals Program – This is delivered by the Occupational Health and Safety Reprisals Program (OHSRP). The OHSRP delivers services from the OWA's provincial office in Toronto. Workers can contact the program by a toll-free telephone number or through the website. OHSRP staff travel to hearings and mediations outside Toronto as required. OHRSP services are delivered by three worker representatives and 1.5 legal assistants, under the

direction of a counsel/manager. Worker representatives are required to be licenced by the Law Society of Upper Canada (LSUC) as lawyers or paralegals.

- Advisory Services Advisory services are provided primarily by telephone, initially by a legal assistant. This includes information about a worker's rights, about the OWA and/or a referral to appropriate assistance. Where workers fall within the mandate or a legal opinion is required to make that determination, they receive an intake interview with a worker representative. If there is sufficient evidence for a reprisal complaint, representation is offered. If there no reprisal or insufficient evidence, workers are provided with detailed legal advice and/or a referral.
- Representation Services Representation services are provided by worker representatives. If a worker accepts the OWA's offer of representation, OWA provides representation at the Ontario Labour Relations Board (OLRB). OWA represents workers at every stage of the reprisal complaint process: drafting applications, mediations, hearings and enforcement. OWA may also engage in negotiations with the employer outside of the formal OLRB process.
- Educational Services Information about rights, processes and sources of assistance is provided directly to workers in response to telephone inquiries. General information about occupational health and safety reprisals and the services provided by the OWA are available on the website as well as in print and email.



*3.5 FTEs are pending approval

STRATEGIC DIRECTIONS

Workplace Insurance Program

Overall Strategy: The highest priority for OWA in 2017-20, as a partner in the workplace safety and insurance appeals system, is to contribute to appeals inventory reduction at the WSIAT. Because OWA is the single largest source of representation for workers at WSIAT, success by OWA will play an important role in WSIAT's overall efforts.

On September 30, 2015, OWA's inventory at WSIAT had reached 1,626, the highest level in OWA's history. This was 976 higher than the ideal level of 650 and represented almost half of OWA's overall caseload. This significantly affected OWA's ability to efficiently turn over cases and manage incoming workload. As of April 1, 2016, OWA had succeeded in reducing its WSIAT inventory to 1,542. In its 2016-17 business plan, OWA committed to focus its resources on efforts to make significant further progress in reducing this inventory. As of March 31, 2017, OWA had succeeded in reducing by 266 (17.3%) to 1,276. In addition, OWA had moved 67.5% of its WSIAT caseload to the resolution stage versus 60.8% on September 30, 2015, meaning that overall more of its WSIAT caseload was closer to final resolution.

In 2017-18, WSIAT will continue to increase its capacity to offer hearings. So OWA must be ready to accept those hearings and assist in continuing caseload reduction at WSIAT. OWA will also actively work with WSIAT, employer and worker community partners to identify and pilot innovative approaches to address the appeals inventory and improve dispute resolution and appeals, including early resolution initiatives and video hearings. This business plan ensures that OWA will continue to collaborate effectively with WSIAT in caseload reduction initiatives.

The OWA will continue to assign new and existing resources to WSIAT cases awaiting hearing dates, to ensure prompt response to offers of hearings, adjusting regional and individual caseloads as required. Based on current workflow analysis, this will reduce OWA's WSIAT caseload from 1,276 as of March 31, 2017 to 1,116 by the end of 2017-18, 1,008 by the end of 2018-19 and 908 by the end of 2019-20. If the collaboration with WSIAT produces improved results, these outcomes will improve.

The continued focus on WSIAT inventory reduction will affect OWA capacity to handle new cases, but this will be sustainable due to a significant reduction in incoming representation work from the high levels earlier in the decade.

OWA operated in 2016-17 at 97.1 FTEs, 3.5 positions above its approved staffing level, with the approval of the Ministry of Labour. This was to support our involvement in reducing our WSIAT inventory. This staffing level will continue from 2017-20. Then, once the OWA and WSIAT return to a manageable caseload, OWA will return to its approved allocation of 93.6 FTEs. It is important to note that this increased FTE level is sustainable without any increase in OWA's salary and benefit allocation.

These additional FTEs consist of two Worker Advisers, a half-time Client Service representative and a WSIAT Caseload Reduction and Service Delivery Transformation Manager. The WSIAT and Service Transformation Manager leads the partnership with WSIAT in inventory reduction and the development of a new Case Management System to support more effective case processing. In 2016-17, these additional staff contributed in a vital way to OWA's inventory reduction at WSIAT, accounting for a total of 57 case resolutions, representing 21.4% of the overall inventory reduction of 266. It is projected that the additional FTEs will contribute 51 resolutions annually in the three years covered by this plan, 2017-20.

To ensure that WSIAT caseload reduction does not impede OWA in dealing with urgent high priority cases such as occupational cancers, OWA will continue to deal with such cases immediately. 190 of these cases are projected for 2017-18, similar to 2016-17 and 56% more than the 2015-16 level.

The OWA's new service delivery model, fully implemented in 2016-17, will continue to ensure comprehensive case reviews and evaluation of case merits, to eliminate duplicate reviews, divert cases from the appeals system and ensure that only cases with a reasonable chance of success are accepted.

Development of a new Case Management System (CMS) will begin in 2017-18 and be completed in 2018-19, in support of the new service delivery model, including a web portal to provide 24/7 access to OWA clients. The cost of the new CMS will be spread over the two fiscal years, at \$485,000 per fiscal year.

The OWA will continue to work with WSIB, WSIAT, other worker representatives and employer representatives to streamline dispute resolution, including video hearings, and divert cases from formal appeals. As part of this initiative, OWA will recruit a Learning Specialist to ensure learning support to Worker Advisers in effective resolution of workers' cases at WSIB and especially WSIAT. OWA will also strengthen staff training and capacity to refer injured workers to alternative sources of support, including in psychological and financial crisis situations.

Occupational Health and Safety Reprisals Program (OHSRP) – Effective April 1, 2014, OWA shifted resources from its workplace insurance program to its OHSRP, which had seen a significant increase in service demand since the program was established in 2012-13. As of March 31, 2017, service demand for 2016-17 and into 2017-18 was on track to return to 2014-15 levels. Overall, demand for OHSRP services continues to fluctuate year to year, but is doing so within a fairly stable range. This means that current staffing levels are appropriate.

In 2017-18, OWA will continue to collaborate with the MOL Health and Safety Program, currently the main source of referrals to the OHSA reprisals program. Targeted outreach to priority vulnerable worker communities will also be carried out.

Overall strategy - OWA will carefully monitor demand for services for its two programs during 2017-18 and beyond, and allocate resources accordingly.

IMPLEMENTATION PLAN

OWA developed a comprehensive operational plan for 2016-17, to ensure implementation of the key strategic directions. This plan will be renewed for 2017-18. The highest priority for 2017-18 to 2019-20 is to contribute to WSIAT caseload reduction, with the objective of accepting the increased number of hearings to be offered by WSIAT. This will involve an analysis and review of current caseloads, matching them with likely offers of hearings from WSIAT. Supporting this is OWA's new service delivery model, fully implemented in 2016-17. This new model focuses more resources on the front end through comprehensive case assessments and referrals and support for injured workers who may need to access other disability programs while they await resolution of their appeals at WSIAT. OWA has assigned a full-time WSIAT Caseload Reduction and Service Delivery Transformation Manager, who will continue to work closely with WSIAT and OWA's management team to ensure nimble management of the caseload reduction initiative.

The plan will continue to include resources to ensure immediate acceptance of urgent and priority cases, estimated at around 190 for 2017-18, and improve the current service level of offering a case assessment within 12 months of initial encounter. This will be reviewed at the mid-year to determine whether adjustments may need to be made in initial service criteria.

Key risks and mitigation strategies have been identified in that section of this business plan.

ENVIRONMENTAL SCAN

WORKPLACE INSURANCE MANDATE

While this part of the scan deals with factors influencing the OWA's workplace insurance mandate, some also relate to the reprisals mandate. Factors relevant primarily to the reprisals mandate are at the end of this scan.

External Factors

- **Fiscal environment** In both its mandates, OWA must allocate its resources prudently and effectively to maximize impact and benefit.
- WSIAT Caseload Reduction This is the most important external factor. 1,276 cases – 44% of OWA's caseload of 2,900 – were in WSIAT's case inventory as of March 31, 2017, affecting OWA's case turnover and its ability to serve new clients. From 2017-18 through 2019-20, WSIAT will continue to add significant resources and will be offering OWA more hearings than in 2015-16 and 2016-17. OWA must be ready to accept those hearings as the key to helping to reduce WSIAT's inventory.
- Growing number of priority cases The OWA has experienced a continuing increase in priority cases such as occupational cancer (with clusters in Peterborough, Sarnia, Timmins, Elliot Lake and Kitchener-Waterloo) and of workers in severe psychological and financial crisis. In 2015-16, 121 such cases

were accepted. Almost as many (108) were accepted in just the first half of 2016-17, with a total projection of over 190 for the full fiscal year. It is anticipated that 2017-18 will also see around 200 priority cases. OWA must be able to accept these cases while simultaneously focusing on WSIAT caseload reduction.

• Paralegal regulation - In 2006, the Law Society of Upper Canada (LSUC) exempted OWA and OEA workplace insurance staff from paralegal regulation. LSUC determined in March 2016 that it will eliminate this exemption in the second half of 2016-17. Following discussions with OWA and the OEA, LSUC has agreed to a transition arrangement where current OWA staff will not have to be licensed paralegals to deliver existing workplace insurance services. Going forward, however, all new OWA staff delivering legal services will be required to be licenced paralegals. Overall, the move to LSUC licencing poses recruitment and training challenges for OWA in 2017-18 and beyond.

Internal Factors

- Staffing levels –During 2016-17, OWA was approved to operate at 97.1 FTEs overall, 3.5 above its base FTE level of 93.6. These additional FTEs were approved temporarily to support the OWA to work with WSIAT on caseload reduction and they did so. The OWA will maintain this level through 2017-20. The OWA will revert to its approved level of 93.6 FTEs once the WSIAT inventory reduction target has been reached.
- Staff renewal and succession issues OWA is in the midst of a significant staff renewal process. In the six years from 2013-14 to 2019-20, around 40% of OWA's staff and managers will retire. This has been posing major challenges in recruitment, management renewal, staff training and succession planning.
- Legacy Case Management System (CMS) OWA's case management system for its Workplace Insurance Program is nearing the end of its life and does not support the Reprisals Program at all. It is anticipated that the new CMS will be developed and implemented over two fiscal years, 2017-18 and 2018-19, with the total cost of \$970,000 split equally between the two years.

HEALTH AND SAFETY REPRISAL MANDATE

External factor

• Legislative Changes -. Effective September 2016, the Occupational Health and Safety Act was amended to impose additional duties on employers with respect to workplace harassment. This is likely to increase demand for OHSRP services in the long term but is not expected to require increased staffing in 2017/18.

Internal factor

- Program Workload Following its inception in 2012-13, the OHSRP saw a large increase in demand for service: by 78% in 2013-14 and another 27% in 2014-15. In 2015-16, demand returned to approximately 2013-14 levels. Based on 2016-17 results, it appears likely that service demand will increase to match 2014-15 levels.
- Service demand for the program appears to have settled into a pattern of annual fluctuations within a fairly stable range. It is, however, likely premature to conclude that demand has stabilized long-term. Because the OHSRP is relatively new, it does not have a large body of historical experience for analysis. Also, the small size of the program means that relatively small changes in capacity or demand can lead to large variations in statistical measures.

RISK IDENTIFICATION, ASSESSMENT AND MITIGATION STRATEGIES

| Identified Risk | Agency Objective Impacted | Likelihood | Risk Level | Mitigating Strategies | Lead | Target Date |
|---|---|------------|---------------|---|--|---|
| Operational Risk: Challenge in contributing to WSIAT caseload reduction initiative | Agency objective to increase capacity at WSIAT year over year, while continuing to respond to incoming work. | Medium | High | Analyze Worker Adviser caseloads quarterly to closely match WSIAT assignments with capacity. Quarterly review with WSIAT of gaps or issues to be addressed. At mid-year in 2017/18 and 2018/19, analysis of impact of WSIAT caseload on front end service capacity, with potential re-focusing of case selection criteria if needed. See HR plan for specific training, coaching and other supports to Worker Advisers. | OWA regional managers OWA WSIAT Backlog Reduction and Transformation Manager OWA Director and management team | Quarterly October 31, 2017 and October 31, 2018 |
| IT Risk: OWA's legacy case management system (CMS) reaching end of lifespan | Optimize OWA's organizational capacity and effectiveness and improve service delivery to clients of both workplace insurance and reprisals programs | High | High | Based on the recommendations of the IT Cluster for a new CMS, enter the development phase in Q3 of 2017-18 and complete development in 2018-19. This will allow cost to be spread over two fiscal years. Work with IT Cluster on maintenance fixes for the current CMS while awaiting development of new CMS. | Director with WSIAT and Service Delivery Transformation Manager and Team Lead, Planning, Finance and ESD | Complete development by September 30, 2018 and implementation by March 31, 2019 |

HUMAN RESOURCES CHALLENGES AND STRATEGIES

| | Key Challenges | HR Issues and Impact | HR Priorities and Actions | Resource |
|---|---|---|---|--|
| | | | | Implications |
| 1 | Succession planning and recruitment | At least 15% of OWA's staff including 3 of 7 managers will retire during the planning period from 2017/18 to 2019/20 | Identify management successors and provide acting opportunities and training Identify and support feeder group candidates for Worker Adviser positions Ensure specific supports for candidates from diverse backgrounds | OWA Director Regional managers Regional managers |
| 2 | Paralegal regulation | Elimination of Law Society exemption of OWA from paralegal regulation during the planning period | Finalize transition plan with Law Society Address implementation details of the move to paralegal licencing Work with Organizational Effectiveness Branch and Recruitment Specialist to address recruitment challenges due to requirement for new hires to be licensed | General Counsel General Counsel Regional managers |
| 3 | Focusing service priorities on WSIAT caseload reduction | Focus on WSIAT caseload reduction will be a challenge for some Worker Advisers who have less experience at the WSIAT level. | Strengthen learning supports for Worker Advisers on best practices at the WSIAT level, including key current issues around pre-existing conditions and new approaches to dispute resolution Assign more experienced Worker Advisers to mentor and support less experienced ones Ensure regular management review of Worker Adviser WSIAT caseloads to support good planning, case assignment and case management Engagement of Worker Advisers in developing case strategies and sharing of advocacy best practices at the WSIAT level | Recruitment of a Learning Specialist focused on developing and maintaining Worker Adviser training program Regional managers with Manager, WSIAT Caseload Reduction Regional Managers and General Counsel |

| | Key Challenges | HR Issues and Impact | HR Priorities and Actions | Resource Implications |
|---|---|--|--|---|
| 4 | Increased level of professional responsibility required of OWA staff providing legal services | More demanding operating environment, especially around appeal time limits, requires an increased level of professional responsibility | Strengthen learning supports for staff Facilitate identification and sharing of best practices as experience as staff work with the new approach Regular management review of Worker Adviser case review documentation, to ensure that the case reviews meet performance expectations Monitor implementation of new service delivery model to ensure consistent approach to comprehensive case reviews and reduce risk of liability | CCSU Training sessions Regional managers Regional managers WSIAT Caseload Reduction and Transformation Manager |
| 6 | Dealing with clients in crisis | Concern about increasing stress on OWA staff from dealing with significant numbers of clients in crisis | Track and de-brief from crisis situations and continue active engagement with peer support and Employee Assistance Program Deliver training on dealing with difficult behaviour | Regional managers Incorporate into learning program developed by Learning Specialist |

COMMUNICATION PLAN

Workplace Insurance Program

Background/context – For the three years covered by this plan, OWA's highest priority will be contributing to WSIAT caseload reduction. Worker stakeholders and referral partners (MPPs, health care providers, community organizations, legal clinics) will be concerned that by focusing resources on WSIAT caseload reduction, OWA will struggle to deal with its incoming workload. The greatest concern will be OWA's capacity to accept urgent and priority cases such as occupational cancers, severely disabled workers and workers in serious psychological and/or financial crisis. Many worker stakeholders know that OWA has reduced case assessment delays from 20 months or more in 2014-15 to around 12 months in 2016-17, but remain concerned about delays.

Positioning – OWA will continue to position its messaging to align with government and Ministry priorities, which include a focus on WSIAT caseload reduction and support for the most vulnerable workers with the most urgent cases.

Objectives and desired outcomes – The objectives will be to strengthen support for the priority on WSIAT caseload reduction and confidence that OWA will continue to be able to accept new work in a reasonably timely fashion. For referral partners, the desired outcome will be increased understanding of the types of cases OWA can accept immediately and those which may have to wait somewhat longer for service.

Target audiences – The main target audience will be referral partners, including WSIB, WSIAT, MPPs, legal clinics, community organizations, disability programs, and health care providers. They are the main sources of referrals to OWA. They are best reached through local contacts, which are well established.

Strategies – OWA's approach will be low-key and targeted. This will focus on an annual cycle of updates to referral partners.

Key messages –

• OWA's focus on WSIAT caseload reduction will result in improved case turnover and service capacity;

- OWA has reduced waiting times from 2014-15 and these will improve from 2017-18 to 2019-20;
- The community can count on OWA to continue to immediately accept urgent and priority cases.

Tactics – Communication will be primarily through direct contact by OWA's local partnership leads, by phone, e-distribution lists, individual e-mails and letters. These communications will link back to regular updates and notices on OWA's website.

Timelines and resources – Resource needs will be minimal and part of ordinary work processes for OWA staff. No significant advertising is planned.

Evaluation – Evaluation will be by mid-year surveys of key referral partners, focused on their level of support for the three key messages.

Occupational Health and Safety Reprisals Program

The communications focus will be on the MOL Operations Division, which is the main source of OHSRP referrals; and on the highest priority communities with vulnerable non-unionized workers who may experience health and safety reprisals. Communications will be low profile and targeted as with the workplace insurance program.

ACTIVITIES INVOLVING STAKEHOLDER GROUPS

Workplace Insurance Program - The OWA contributes to effective dispute resolution and a healthy economy through partnerships:

- WSIAT collaboration on caseload reduction and input on operational issues through WSIAT's Advisory Group and by direct agency to agency.
- **WSIB** input on operational issues through WSIB's Labour and Injured Worker Advisory Committee (LIWAC) and agency to agency discussions; operational collaboration on priority issues such as occupational disease clusters.
- **Multi-partner collaborations** Including Fatalities and Immediate Response (FAIR) Partnership (OWA, MOL, WSIB, Threads of Life) to provide timely, seamless, and comprehensive assistance to family members following a

traumatic workplace fatality or a catastrophic injury; WSIB/OWA/WSIAT partnership for support and response to workers in psychological or financial crisis; OWA/ODSP (Ontario Disability Support Program) partnership to improve referrals between the programs.

- Community partners (injured worker groups, legal clinics, immigrant groups, food banks, First Nations organizations) referrals and collaboration to support particularly vulnerable worker populations.
- Members of Provincial Parliament referrals to OWA from MPPs, who are not permitted to represent their constituents before WSIB and WSIAT.

Occupational Health and Safety Reprisals program - The OWA will continue to consult and/or collaborate with the following stakeholders and system partners:

- Ministry of Labour Occupational Health and Safety Program facilitating referrals from health and safety inspectors;
- Office of the Employer Adviser cooperating on dispute resolution;
- Office of the Chief Prevention Officer supporting Ontario's prevention strategy, especially around support for vulnerable workers;
- Ontario Labour Relations Board cooperating on efficient and effective dispute resolution;
- Toronto Workers' Health and Safety Legal Clinic case strategy cooperation.

APPENDIX A - Multi-Year Preliminary Planning Base (see attached)

APPENDIX B – Performance Measures (see attached)