

11 July, 2016

WCB Review Panel  
c/o Service Alberta Mailroom  
11th Floor, Commerce Place  
10155 - 102 Street  
Edmonton, AB T5J 4L5

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2016

Dear Panel Members:

We are writing to provide comments from the perspective of an industry association which draws together owners of constructed assets plus the engineers, contractors and labour providers who deliver successful heavy industrial construction projects. COAA has been a driving force in improving the safety performance of our industry over the past two decades; we have played leadership roles in, for example, conceptualizing WorkSafe Alberta, developing the Canadian Model for Providing a Safe Workplace, and calling industry to action "Twice as Safe, Twice as Productive by 2020".

Our starting point is to acknowledge, with appreciation, the outstanding accomplishments of WCB in managing both the human aspect of workplace injury and rehabilitation, as well as the financial aspect of a massive insurance program – all during a time of unprecedented growth of the Alberta construction workforce. We are told by member companies which operate in several provinces that WCB is a leader across Canada.

Given this opportunity to re-imagine WCB, we offer three ideas for consideration.

First, a more outward-facing organization would better serve both the employer and worker stakeholders of WCB. Some of our member companies have noted that the governance of WCB is opaque; it is not clear to them how WCB Directors are selected. Once appointed, Directors are not available for dialogue about policy decisions with broad industry implications. Direct discussion would equip Directors with a better understanding of the effects on industry. Is the Board confident that they understand the employer perspective on the proposal to raise the level of insurable earnings? Would employer input provide better direction for higher impact stewardship of surplus employer contributions into research or improvement projects? With respect to protecting aging workers, who may be more prone to injury and/or cumulative effect of multiple small injuries, are employer views and worker views opposed – or do they in fact align?

Second, a more strategic vision – beyond the reactive role of insurance to proactive leadership on risk reduction – would create substantial value for workers, employers and WCB alike. There is well established precedent for this approach in both the property insurance and the professional liability insurance sectors. We are heartened to see the seeds of this idea being planted as WCB provides data grants to researchers such as Dr. Lianne Lefsrud and Dr. Joel Gehman, who are investigating the effectiveness of various education, compliance and enforcement actions – i.e. how they affect the subsequent claims rates at employee, firm, and industry levels. We are aware of other safety initiatives,

such as the *MySafetySurvey.com* tool developed by Dr. Louis Francescutti and team, which cross several industry sectors and which would benefit from multi-sector developmental funding. With a larger strategic vision of risk reduction, modest effort to make available vital data, fostering of multi-sector initiatives and a more synergistic partnership with Alberta OHS, it is possible for WCB to play a leadership role in improving workplace safety.

Third, a more tailored approach to interfacing with WCB client companies would ease the administrative burden related to rehabilitation and reintegration of injured workers; one size does not fit all. There is a broad spectrum of employers – in terms of company size, of sophistication of safety and HR programs, and of corporate culture. At one end of the spectrum, more tangible, prescriptive direction is likely needed from WCB; at the other end of the spectrum, a broad statement of principles and outcomes is all that is needed to enable effective and innovative responses from conscientious corporations.

About the consultation process: our experience with a number of other broad industry consultations has led us to believe that compressed schedules and “workbook” approaches diminish the richness of stakeholder input – insights which can be so valuable to an evolving organization.

We appreciate the opportunity to provide comments as the future of WCB is re-imagined. If follow-up conversation would be useful, we would be pleased to make available members of our Board of Directors and/or members of our Safety Committee.

Respectfully,



L.B. Staples, P.Eng.  
Interim Executive Director