



GUIDE

# The manager's guide to health monitoring programs

Practical steps for strategic programs that prevent illness and injury



# Introduction

In Canada, many provinces and territories require employers and worksites to run occupational health and medical surveillance programs. These programs monitor the health of employees exposed to hazards like noise, certain metals and chemicals, or airborne particles. By detecting changes in an employee's health status early, employers can act to make improvements in the workplace before small issues become bigger problems.

With competing priorities and compliance demands, health monitoring programs often slip down the list, even though they can prevent serious incidents and time away from work.

This guide gives you practical steps to understand your obligations, set up programs that meet Occupational Health and Safety (OHS) legislated requirements and protect your workers.

## Inside, you'll find:

A 90-day timeline with clear milestones

Canadian data on exposures, injury impact, and program outcomes

Guidance on occupational testing requirements that support prevention

Tips for using program data to improve performance

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# Your role under the law

Canadian OHS law is built on the Internal Responsibility System (IRS)—a shared responsibility among employers, supervisors, and workers—with employers holding the primary legal obligation. This includes the duty of Due Diligence: taking every reasonable precaution to prevent workplace injuries and illnesses. Rules for health monitoring vary across Canada. As an employer, you need to know when programs apply and how to run them. Meeting the rules protects workers and avoids costly penalties, while building credibility for your workplace health program.



# Health monitoring requirements across Canada



## Follow the rules that apply to you

Health monitoring programs are shaped mostly by provincial law and in certain cases, such as federally regulated professions, by federal law. These rules define when worker health must undergo health assessments, which hazards to include, and how to respond when issues are found. They also make it clear that employers are responsible for setting up the program, educating and involving employees in the process, and acting on findings.

Because each province sets its own legislation, there's no single program that applies everywhere.

Understanding your obligations shows where gaps may exist. Because requirements differ by hazard and jurisdiction, early monitoring and keeping up with changes in the codes of practice are essential.

The cost of ignoring these rules is high. In Ontario, individuals including directors, officers, and supervisors can face fines up to \$500,000 and/or imprisonment, while corporations can be fined up to \$2 million.<sup>4</sup> Companies may also face stop-work orders and damage to their reputation. A 2025 national report linked gaps in prevention to higher injury rates and more workers' compensation claims.<sup>5</sup>

## Spotlight on provincial regulations



### Ontario:

Regulation 490/09 requires medical checks for workers exposed to designated substances such as asbestos, lead, and mercury.<sup>1</sup>



### British Columbia:

Part 6 of the OHS Regulation applies when an exposure control plan identifies a hazard.<sup>2</sup>



### Alberta:

The government can order monitoring programs when worker health may be at risk.<sup>3</sup>



### Quebec:

Requires employers to implement health monitoring programs for workers exposed to contaminants or hazardous materials, as determined by regulations and guidelines from the Commission des normes, de l'équité, de la santé et de la sécurité du travail (CNESST).<sup>4</sup>

## Compliance checklist

- Confirm the legislation in every jurisdiction where you operate. Keep in mind: the law applies to the worksite location, not your head office.
- Know when monitoring must begin, based on exposure levels set in the legislation that applies to your worksite.
- Assign clear roles so your program meets all requirements under the legislation. Many codes of practice call for a program administrator to run the program and make sure it stays compliant.
- Maintain program records in a secure, centralized, and defensible format for the legally mandated period to demonstrate Due Diligence to regulators.

## Choosing the right partner

**Running a health monitoring program requires an Occupational Health partner that helps you:**

- Meet obligations
- Lighten the administrative load
- Build employee confidence

**Choose a partner that offers:**

- Medical expertise
- Accurate testing
- Dependable reporting

**Most organizations bring in outside providers to manage:**

- Scheduling
- Testing
- Record management/storage



Meeting the rules is only the starting point. The Ontario Workplace Safety and Insurance (WSIB) Health and Safety Index shows that workplaces with stronger prevention efforts see measurable improvements.<sup>6</sup> Coordinating testing and reporting with a single provider decreases duplication of work and lightens the administrative load. Integrating health monitoring data with WSIB/Workers' Compensation Board (WCB) claims management and Return-to-Work programs—both legally regulated processes—creates a seamless approach to worker health. Working with the right occupational health partner will help you meet OHS obligations, reduce claims, protect your workers, and keep operations steady.

# Why health monitoring matters

Employers today face growing regulations and a wide range of health risks. Many workplaces rely on policies and personal protective equipment alone, but that leaves gaps. Hearing (audiometry) and breathing (spirometry) tests are often pushed aside. Regular health monitoring through these tests shows if your safety measures are protecting workers from occupational hazards.



# Preventing hearing loss at work

## Hearing loss prevention programs

Noise on the job is common. About 11 million Canadians have worked in loud environments,<sup>7</sup> and hearing loss is the top workplace injury claim in the country – even though it’s also one of the most preventable.<sup>8</sup> A hearing loss prevention program shows if your current safety measures are working.



Untreated hearing loss drains about

**\$25 billion each year**

from Canada in healthcare and lost time. Regular hearing tests can ease this burden and protect workers.

Source: Canadian Hard of Hearing Association. Spend to Save: Adult Hearing Health – Canada’s Growing Challenge. 2024. Based on EHIMA/Shilef 2019 estimates.

## Beyond basic testing

Most provinces mandate testing when noise reaches an average of 85 dBA over an eight-hour shift, while federally regulated workplaces set the limit at 87 dBA.<sup>9</sup> Like other regulated workplace hazards—such as exposure to designated substances including lead, asbestos, and silica—noise exposure programs may require exposure control plans and regular health monitoring as mandated by provincial OHS regulations.<sup>10</sup> Most hearing loss prevention programs start with a baseline test to check a worker’s current hearing. Follow-up tests are then scheduled to look for changes, based on the timelines set in legislation for your workplace. Strong programs combine testing with noise control measures, proper hearing protection, and in some cases, custom-fitted hearing devices that last longer and can be cost-effective over time. Spotting early changes in hearing helps prevent lasting damage and keeps employees safe.

## Measuring progress

Good programs don’t just collect data – they put it to work. Track employee participation and threshold shifts to see if hazards are being managed. If the data shows numerous threshold shifts at a worksite, it may be time to review safety controls. Comparing your results with past program data, and against industry benchmarks when available, shows your program’s value and identifies areas to improve.<sup>12, 13</sup>

## Keeping it practical

Bringing mobile testing to your site saves travel time and makes it easier for staff to take part. Certified technicians, equipment designed specifically for audiometric testing, and clear communication give employees trust in the process.

# Keeping workers safe from airborne hazards

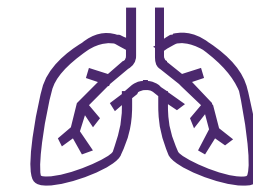
## Lung health surveillance programs

Breathing problems often develop slowly, especially for people who work around dusts or fibres like silica and asbestos. By the time symptoms show, damage may already be done. Having a proper lung health surveillance program allows you to act sooner, adjust controls, and protect the lung health of your workers.

## High-risk industries and exposures

Certain workplace exposures carry such serious risks that provinces have put codes of practice and surveillance rules in place. Asbestos is still present in older buildings and remains a concern for construction and demolition workers.<sup>15</sup> Crystalline silica, common in mining, foundries, and stone cutting, is a leading cause of silicosis and contributes to lung cancer.<sup>16</sup> Coal dust remains a long-recognized hazard in mining, tied to chronic bronchitis, emphysema and reduced lung function.<sup>17</sup> Isocyanates, used in spray paints, foams, and adhesives, are known to cause asthma and long-term respiratory damage.<sup>18</sup>

Industries such as mining, construction, oil and gas, and manufacturing employ large numbers of workers who may be exposed to one or more of these hazards. For these groups, lung health surveillance isn't optional. In many cases, it's required by law to keep workers safe and employers compliant with occupational health standards.



Workplace exposures cause about

**15% of COPD cases in Canada.**

Lung health surveillance programs help employers find problems early and protect their worker's health.<sup>14</sup>

Source: Canadian Centre for Occupational Health and Safety

## Assessing lung function

Spirometry is the standard test for measuring how well lungs move air. Results are only valid when trained staff use the right equipment and combine the results with other legislated tests like chest x-rays or medical exams.<sup>19</sup> How often testing is done depends on the laws for your worksite. In Ontario, for example, medical surveillance is mandatory for certain designated substances,<sup>20</sup> and many employers go further to include other exposed groups. As an employer, it's important to know your responsibilities around airborne contaminants, and your applicable worksite legislation sets those requirements.

## Using the results

One test gives a snapshot. Compiling data over years of exposure reveals patterns that could be tied to specific worksites. This data points to where controls or practices need adjustment. Research from the Centre for Research Expertise in Occupational Disease (CREOD) shows that regular testing and early detection lead to better worker health.<sup>21</sup>

# From compliance to prevention in 90 days

This plan shows how to build health monitoring programs that meet regulations, protect employees, and demonstrate value. It begins with compliance checks, adds structure through medical oversight and organized systems, and by the end connects health data with prevention results that lower exposure risk.



# Your first steps toward prevention

Many workplaces use a “Plan, Do, Check, Act” approach to build health and safety practices. The same approach applies to your 90-day action plan, a flexible framework you can adapt to your organization’s needs.

## Phase 1: Plan

### WEEKS 1–2: CHECK COMPLIANCE

Begin by reviewing your obligations under occupational health and safety legislation. Most laws require a hazard assessment for worksites where hazards are present. CCOHS recommends a step-by-step approach: identify hazards, decide how serious they are, and focus on the most serious risks first.<sup>22</sup> The information you collect can be compared with the requirements for your worksite. If your assessment shows exposure risks that call for a monitoring program under the law, you now have a framework. Program development takes time, so don’t rush this stage. A careful review makes sure your program is compliant.

### WEEKS 3–4: BUILD YOUR FOUNDATION

Next, set up the structure. Assign roles and responsibilities for your program and build a relationship with a third-party occupational health provider. This provider can handle testing, set up appointments, and deliver results that meet required standards. Expert oversight from an occupational health physician or medical director is also key, as their guidance can help keep your program aligned with best practices. TELUS Health’s guide Transforming Occupational Health with the Right Expertise explains how medical leadership makes a direct difference in workplace safety.<sup>23</sup>

Once your program and team are set up, create a clear communication plan to tell your workers about it. Good communication helps them understand the purpose and see how it protects them. WorkSafeBC advises employers to keep records of their risk assessments, share them with workers, and show what steps were taken to control hazards. This makes it easier to mark progress and show due diligence.<sup>24</sup>

# Suggested 30-60-90-day milestones

## Phase 2: Do

### 30 DAYS: COMPLIANCE IN PLACE

By the end of the first month, your program should be set up and running, with systems implemented to capture health checks and results. A compliance review in phase 1 confirmed that you meet provincial rules and occupational health and safety standards.<sup>25</sup>

### 60 DAYS: STRATEGIC FOUNDATION BUILT

By day 60, most of your workers should have completed their first tests. Health surveillance legislation often requires that workers be evaluated before exposure begins—typically at pre-placement or initial assessment—to establish a baseline and ensure compliance before any hazard contact occurs. Your third-party occupational health provider should also have systems prepared to handle scheduling, reporting, and logging participation to confirm tests are completed on time.

### 90 DAYS: FULL PROGRAM OPERATING

At the end of three months, your program should be well established. Results are captured in one platform so information is organized and accessible. A centralized system supports program management and gives you a clear view of how well your safety practices are working. At this stage, focus on employee participation, early detection, and compliance results to show the impact of your program and strengthen the case for prevention.

# How to track results

## Phase 3: Check

Strong health programs rely on proof, not guesswork. Tracking requirements, daily operations, health outcomes, and financial impact shows where prevention works and where to adjust. Looking at both early warning signs and long-term results gives employers the insight to make better decisions. A high number of abnormal test results from health monitoring programs means your safety practices aren't working and need to be adjusted.

Measuring your program shows if you're meeting legal obligations and if your program is working. Checking the effectiveness of a program typically looks at four areas:



### Compliance

Following regulations, complete, verifiable records that create a legally defensible position of Due Diligence.



### Operational

Worker participation, scheduling, program costs



### Health

Early signs of risks, fewer incidents, lower claims



### Business

Return on investment, employee morale, fewer disruptions

CCOHS recommends using both leading and lagging indicators.<sup>26</sup> Leading indicators include things like training completion and near-miss reports, which flag risk before harm occurs. Lagging indicators include incident rates or compensation claims, which show long-term outcomes.

When you connect prevention data with engagement, outcomes, and expenses, the link between worker protection and performance is clear. Programs that cut claims, minimize disruption, and support morale prove their value across the workplace.

## Phase 4: Act

After reviewing your data, make changes to strengthen your program and involve people at every level, keeping safety a shared priority and giving workers an active role in the solution.

# TELUS Medical surveillance and health monitoring

## 1

### Protecting your workforce

TELUS Health delivers occupational health services that keep employees safe and organizations aligned with regulations. Our programs cover medical surveillance for hazardous exposures such as noise and airborne contaminants. These programs help detect concerns early before they become long-term problems.

## 2

### Medical surveillance for hazardous exposures

We provide monitoring for legislated substances such as lead, asbestos, silica, and noise. Our certified professionals ensure your program meets the rigorous technical standards and record-keeping requirements necessary for regulatory audit and compliance. We can also work with you to develop health monitoring programs for non-legislated hazardous exposures that support your team's health and safety from end to end.

## 3

### Digital tools and preventive services

We combine medical oversight with digital scheduling, documentation, and reporting to make compliance straightforward. Beyond regulations, these tools cut down on lost workdays, support employee wellbeing, and maintain safer job sites.

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### About TELUS Health Care Centres

TELUS Health Care Centres are helping drive healthier outcomes for Canadians through preventive and occupational health solutions offered in our 14 clinics and on work sites nationally. As part of the TELUS Health family, we're committed to innovation, collaboration and excellence. We're investing in cutting-edge technology to support more effective preventive screening for employees and individuals. Our clinical team is composed of renowned and passionate health professionals, including certified audiometric and spirometry technicians, kinesiologists and occupational health physicians, delivering best-in-class, people-centric care. We're on a mission to be the most trusted wellbeing company in the world.

## Discover our services

[telushealth.com/OccupationalHealth](https://telushealth.com/OccupationalHealth)