

Basics of due diligence

Due diligence means taking all reasonable steps to protect workers from harm. “All reasonable steps” is based on considering what a reasonable person would do in the circumstances.

The information in this resource is for employers to help you understand what due diligence means for your workplace.

Steps to due diligence

Although workers and supervisors also have roles to play, the ultimate responsibility for due diligence lies with employers. There are also specific due diligence responsibilities for prime contractors and owners.

What due diligence looks like varies by workplace. However, some due diligence responsibilities that apply to all employers include:

- Knowing your obligations under the [Workers Compensation Act](#) and the [Occupational Health and Safety Regulation](#)
- Ensuring that you have all the elements of an [occupational health and safety program](#) in place, that those elements have been implemented, and that they have been communicated to all affected workers and supervisors
- Providing all workers with the information, instruction, training, and supervision needed to ensure their health and safety
- Being proactive in identifying workplace hazards and managing risk
- Documenting and verifying the steps you take to create a safe and healthy workplace

These last two responsibilities are explained in more detail below.

Use a risk-based approach

Using a proactive, risk-based approach to managing risk is a good way to make sure you have taken all



reasonable steps to protect your workers. Steps in a risk-based approach include:

1. Understanding the risks in your workplace by identifying the hazards and assessing the level of risk associated with each
2. Implementing appropriate measures to eliminate or control those risks, following the [hierarchy of controls](#)
3. Communicating your policies and protocols to all workers and supervisors, and providing training on work processes where needed
4. Monitoring your measures to ensure they are being understood and followed, and making updates when necessary

Your workers have first-hand knowledge about key risks in your workplace. Be sure to engage with everyone in your workplace to assess risks and discuss appropriate controls. This includes talking with front-line workers and supervisors, as well as with your joint health and safety committee (or worker health and safety representative) if you have one.

Document the steps you take

Clear documentation is an important part of due diligence. Documentation is about more than just paperwork — it is an effective tool to help you check that you are implementing all your health and safety practices. Any gaps in your documentation can clearly signal areas where your health and safety measures are lacking.

Your documentation can also be used as evidence if you ever need to prove your due diligence (e.g., during a WorkSafeBC inspection or following an incident).

Maintaining thorough documentation such as the following can help you track and verify that you are taking the proactive steps of due diligence:

- Your overall health and safety program, as well as any specific programs that apply to your workplace such as:
 - Noise control and hearing conservation
 - Violence prevention
 - Working alone or in isolation
 - Combustible dust management
 - Confined space entry

- Key risk inventories, risk assessments, and controls implemented
- Written safe work procedures
- New and young worker orientation records
- Worker certification records
- Notes from regular safety meetings
- Equipment pre-use checklists and maintenance logs
- Records of regular inspections of machinery, facilities, and work practices
- Sampling and monitoring records (e.g., noise, hazardous substances)
- Incident investigation reports, particularly any corrective actions taken after an incident
- Written recommendations from your joint health and safety committee, and your responses to those recommendations
- Records of supervision activities such as positive reinforcement of workers' safe behaviours, correction of unsafe behaviours, and checking workers' understanding of safety procedures

To be effective in showing due diligence, your documentation should include details such as times, dates, and observations about what is happening in your workplace. Talk to your workers to ensure they understand and can validate the success of the measures you put in place.

Be sure to review your documentation regularly to confirm it is up to date, and to check that your procedures are effective in maintaining a safe and healthy workplace.

For more information

Visit [Due diligence](#) and [Managing risk](#) on worksafebc.com for more information and resources.

You can also call our Prevention Information Line at 1.888.621.7233 if you have questions about workplace health and safety.