
WHMIS Training Record Management Policy

1.0 Policy Purpose & Scope

The purpose of this policy is to define the mandatory procedures for creating, maintaining, and retaining WHMIS (Workplace Hazardous Materials Information System) training records for all employees, contractors, and visitors who may be exposed to hazardous products in the workplace. This policy ensures that the organization can demonstrate compliance with WHMIS 2015 (GHS) training requirements, provides a clear audit trail for regulatory inspections, and minimizes corporate liability by verifying that every individual handling or near hazardous materials has received current, documented training. This policy applies to all full-time, part-time, temporary, and contract personnel at all company-operated sites, including offices, warehouses, and field locations.

2.0 Regulatory Context & Compliance

This policy is driven by the following legislation and standards:

- (a) The Hazardous Products Act (HPA) and the Hazardous Products Regulations (HPR) – federal requirements for supplier labels and safety data sheets;
- (b) The Canada Labour Code, Part II (for federally regulated workplaces) or applicable provincial OHS legislation;
- (c) WorkSafeBC Occupational Health and Safety Regulation (OHSR), Part 5 – Chemical Agents and Biological Agents, specifically sections 5.5 to 5.14 regarding worker education and training;
- (d) The Workers Compensation Act (British Columbia) – employer duty to provide instruction and training;
- (e) Provincial WHMIS regulations as adopted under each jurisdiction's OHS Act. Compliance with these regulations requires that training records be maintained for the duration of employment plus a minimum of two years after termination, or as specified by the applicable jurisdiction, and be readily accessible to the joint health and safety committee and regulatory inspectors.

3.0 Roles & Responsibilities

Employer/Management:

- (a) Ensure that a WHMIS training program is developed, implemented, and updated at least annually or whenever a new hazard is introduced;
- (b) Provide resources for training delivery and recordkeeping systems;
- (c) Designate a competent person to manage training records;
- (d) Ensure that training records are retained for the required statutory period and are available for inspection.

Supervisors: (a) Verify that each worker under their supervision has completed WHMIS training before being assigned tasks involving hazardous products;

- (b) Maintain a current list of trained workers in their area;

- (c) Report any training gaps or expired certifications to the training record administrator;
- (d) Ensure that workers receive site-specific hazard training in addition to generic WHMIS training.

Workers: (a) Complete WHMIS training as scheduled and before handling any hazardous product;

- (b) Sign the training record to confirm understanding;
- (c) Report any changes in job duties that may require additional training;
- (d) Retain personal copies of training certificates as provided.

4.0 Program Execution & Procedures

4.1 Training

Delivery: All WHMIS training shall be delivered by a competent instructor using approved materials that cover:

- (a) the WHMIS 2015/GHS system, including hazard classes and pictograms;
- (b) label elements and safety data sheet (SDS) format;
- (c) procedures for safe handling, storage, and disposal of hazardous products;
- (d) emergency response procedures. Training may be delivered in-person, via e-learning, or through a blended approach.

4.2 Record

Creation: Immediately upon completion of training, a record shall be generated for each participant containing: full name, employee ID, date of training, training provider name, course content summary, expiry date (if applicable), and a statement of successful completion. Records shall be signed by the trainer and the worker. 4.3 Record

Storage: All training records shall be stored in a secure, centralized database (e.g., SafeDesk) with backup copies. Physical copies, if used, shall be kept in a locked filing cabinet. Records must be indexed by worker name and date for easy retrieval. 4.4 Record

Updates: Whenever a worker receives refresher training or additional hazard-specific training, a new record shall be added to their file. Expired records shall be archived but not destroyed until the retention period has elapsed. 4.5 Access and

Verification: The joint health and safety committee, safety representatives, and regulatory inspectors shall have unrestricted access to training records upon request. Supervisors shall verify training status before permitting work with hazardous products.

5.0 Review & Recordkeeping

5.1 Record

Retention: WHMIS training records shall be retained for the duration of the worker's employment plus a minimum of two years after termination or as required by applicable legislation (whichever is longer). Archived records shall be stored in a secure, access-controlled environment. 5.2 Policy

Review: This policy shall be reviewed annually by the joint health and safety committee and the Corporate Safety Director.

The review shall assess: (a) compliance with current regulatory changes;

- (b) effectiveness of the recordkeeping system;
- (c) any gaps identified during inspections or audits. Revisions shall be documented and communicated to all affected parties.

5.3 Audit

Trail: All changes to training records (e.g., corrections, additions, deletions) shall be logged with the date, name of the person making the change, and reason for the change. The audit trail shall be retained for the same period as the training records.

Regulatory Disclaimer: This policy is a generic organizational template. The end-user assumes all liability for reviewing and adapting these protocols to meet specific provincial regulations (e.g., WorkSafeBC, OHSA) and corporate requirements prior to formal implementation.