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PRACTICAL GUIDE · QUEBEC EMPLOYERS

# Law 27: what you must have in place by October 1, 2026

Every establishment in Quebec must have a prevention program or an action plan that covers psychosocial risks. This guide sets out the obligations, the deadlines and the first steps to take.



Updated August 2026. Reflects the regulation in force since October 1, 2025 and the mandatory integration of the psychological harassment policy.

THE CONTEXT

# A modernized regime, built for today's realities

If you work in human resources, in occupational health and safety, or as a manager, you have probably heard of Law 27. You may be wondering what it actually changes, how far it applies to you, or where to begin. That is fair: the reform can look technical at first.

## It reaches straight into your teams' daily work, and it can become a real lever for well-being and performance.

Assented to in October 2021, Law 27, officially *An Act to modernize the occupational health and safety regime* and known in legal circles as Bill 59, is the most significant overhaul of Quebec's occupational health and safety system in more than 40 years. It was designed to better protect workers in a working world that has changed: mental overload, isolation and constant pressure are realities that can no longer be set aside.

The **Regulation respecting prevention and participation mechanisms in an establishment** came into force on October 1, 2025 and brought the interim regime to an end. Employers have one year to develop and implement their prevention program or action plan: for establishments already in operation on that date, the deadline falls on **October 1, 2026**. Since then, psychosocial risks related to the work appear expressly in the mandatory content of those documents, alongside chemical, biological and ergonomic risks.

| DATE | WHAT APPLIES |
|---|---|
| **October 6, 2021** | Assent of Law 27, which amends the Act respecting occupational health and safety and the Act respecting industrial accidents and occupational diseases. |
| **October 1, 2025** | The permanent regime comes into force. Psychosocial risks become mandatory content of the prevention program and the action plan. The psychological harassment policy must be integrated into them. |
| **October 1, 2026** | **Deadline for establishments already in operation on October 1, 2025. The prevention program or action plan must be developed and implemented.** |



**FOR LEADERSHIP** The deadline is a matter of regulatory compliance. A failure exposes the organization to penal sanctions and weakens its position on due diligence.

THE PURPOSE OF THE LAW

# What are the objectives of Law 27?

### 1. Preventing psychosocial risks

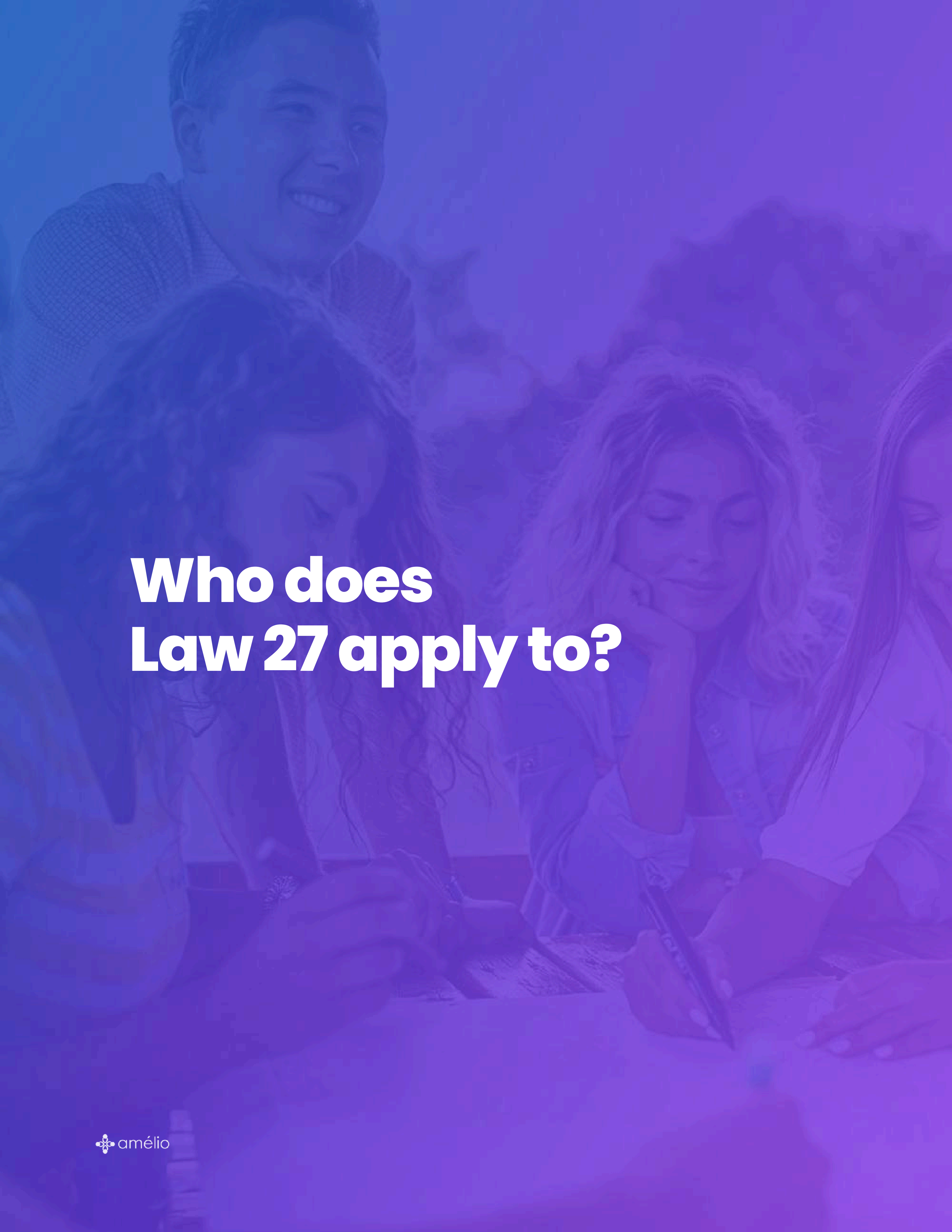
Prevention is now an obligation. Gone are the days when weak signals could be handled on instinct or case by case. From now on they have to be assessed, documented and acted on. The good news? It does not have to be complicated, provided you have the right tools.

### 2. Giving employees a real voice

Law 27 is not only about diagnostics or programs to put in place. It is also about the active participation of workers. Because, let us be honest, who is better placed to speak about the risks than the people who live with them every day?

> In establishments with 20 workers or more, the law provides for a health and safety committee bringing together representatives of the employer and of the workers. An excellent opportunity to strengthen the collaboration between HR, occupational health and safety, and managers.

Information document. It has no legal value and is not a substitute for legal advice. See the full notice on the last page.



# Who does Law 27 apply to?

# Everyone, whatever your sector, your size or your role

Whatever your sector or the size of your organization, you have to comply with Law 27. The law also provides measures for businesses with fewer than 20 employees, notably the designation of a health and safety liaison officer.

### Employers: a legal obligation, a real opportunity

Law 27 requires employers to identify psychosocial risks, to put participation mechanisms in place and to document their actions. Beyond the obligation, it is a chance to improve the climate, retain talent and prevent crises.

### Workers: a role finally recognized

Workers gain a genuine voice through health and safety committees or liaison officers. Their experience on the ground becomes a lever for prevention.

### HR and OHS: toward an integrated approach

Too often kept apart, HR and occupational health and safety professionals now have to work together. Law 27 encourages that synergy, which is essential to a lasting culture of prevention. At Amélio, we make the convergence easier with a platform built for both: intuitive HR tools and clear OHS indicators.

WHAT THE LAW REQUIRES

# Obligations vary with the size of the establishment

The choice of mechanism does not depend on the sector but on headcount, around a single threshold set at 20 workers. The sector comes in elsewhere: it determines the establishment's level, which sets how often the committee meets, how much time the representative is released for, and the training deadlines.

| | FEWER THAN 20 WORKERS | 20 WORKERS OR MORE |
|---|---|---|
| **Prevention mechanism** | Action plan | Prevention program |
| **Participation mechanism** | Health and safety liaison officer | Health and safety committee and health and safety representative |
| **Psychosocial risks** | Must be **identified** | Must be **identified and analyzed** |
| **Mandatory training** | Liaison officer: a free two-hour online course, within the year following designation | Committee members: one day. A representative who sits on the committee takes both courses, so two days; one who does not takes a two-day course. Every representative then adds 7 hours of continuing training every 2 years |

### Three points on how the threshold applies

1. **The threshold is assessed on an annual basis.** An establishment that groups at least 20 workers at any point in the year is subject to the prevention program, and the obligation continues until December 31 of the following year even if headcount falls in the meantime.
2. **The committee is subject to a duration test that the program is not.** The obligation to form a committee does not apply to an establishment that groups 20 workers or more for fewer than 21 days in the year. That exception covers the committee and the representative, not the prevention program.
3. **The establishment's level sets the training deadlines, not the program deadline.** The regulation classifies activities into four levels based on NAICS codes. The attestation is due on the later of two deadlines: 120 days after designation, or the date for the level, being October 1, 2026 at level 4, April 1, 2027 at level 3, October 1, 2027 at level 2 and April 1, 2028 at level 1.

### How often the committee meets

The rules in the regulation are suppletive: they apply where the committee members have not agreed otherwise. Failing agreement, four meetings a year at level 1, six at levels 2 and 3, nine at level 4, and at least one per quarter. After a death, a permanent impairment or injuries that keep several workers off the job, the committee meets within 3 working days of a request by one of its members.

**Transitional measure:** until September 30, 2026, a level 4 establishment that had no committee on September 30, 2025 is held to six meetings a year.

MANDATORY CONTENT

# What the program and the plan must contain

Section 59 of the Act respecting occupational health and safety lists the content of the prevention program, and section 61.2 that of the action plan. These items are written into the Act, and an inspector can note their absence.

**Prevention program · section 59**

**1.** The identification and analysis of risks that may affect workers' health, including chemical, biological, physical, ergonomic **and psychosocial risks related to the work**, as well as risks that may affect their safety, including those affecting workers aged 16 or under

**2.** The measures and action priorities to eliminate or control those risks, with timelines

**3.** Monitoring, assessment, maintenance and follow-up measures

**4.** Individual protective means and equipment

**5.** Training and information programs

**6.** Health examinations required by regulation

**7.** The list of hazardous materials and contaminants, kept up to date

**8.** An adequate first aid service

**9. The policy to prevent and manage situations of psychological harassment**

**Action plan · section 61.2**

Items **1, 2, 3, 4, 5 and 9** from the list opposite. The Act requires risks to be identified, without requiring their analysis.

That cross-reference is a shortcut. Section 61.2 has its own wording, narrower on two points, and it adds the responsibilities of the parties involved.

**Recurring obligations**

The program and the plan must be updated **every year**. The **prevention program** must also be filed with the CNESST **every three years** from the date it is implemented: action priorities, progress on the measures planned and follow-up on the measures in place. The action plan is not covered by that filing.

## Two common failings

Failing 1

### A harassment policy kept in a separate document

Since October 1, 2025, the policy to prevent and manage situations of psychological harassment is an integral part of the program or the plan. Kept separately, however well drafted, it no longer meets the requirement. Section 81.19 of the Act respecting labour standards also sets its content, which the CNESST details in its drafting aid: prevention methods, information and training, conduct at work-related social activities, how to file a complaint, the persons designated, protective measures, the investigation process and confidentiality, with a document retention period of at least two years.

Failing 2

### The hierarchy of measures skipped

The regulation imposes an order: eliminate risks at the source, substitute, implement engineering controls, install warning systems, apply administrative controls and, as a last resort, provide protective equipment. Employee assistance programs and stress awareness sessions sit at the bottom of that hierarchy. A plan that starts and ends there does not meet the requirement.

# Psychosocial risk factors at work

Adding psychosocial risks to the mandatory content is the most significant change in the permanent regime. Those risks now have to be treated like the others: identified, documented and controlled. The Act sets out no closed list. The CNESST groups the work-related factors under six headings, and its risk identification guide details more than twenty.

1. **Workload**
2. **Decision-making autonomy**
3. **Recognition at work**
4. **Support at work**
   from the immediate supervisor and from colleagues
5. **Organizational justice**
6. **Forms of violence**
   psychological harassment, sexual harassment, sexual violence

These factors interact and have to be considered as a whole. The CNESST also treats harassment, workplace violence, domestic, family or sexual violence, and exposure to a potentially traumatic event as psychosocial risks. The Act states expressly that psychosocial risks include risks related to sexual violence.

## What identification involves in practice

Neither the Act nor the regulation prescribes a method, a tool or a survey. The obligation bears on the result: a documented identification, grounded in facts, and for the prevention program an analysis that allows action priorities to be ranked. The CNESST recommends combining several means of collection rather than relying on one, and lists among its prerequisites the employer's commitment, worker participation, objectivity and documentation of the process.

The choice of method therefore rests with the employer. Structured surveys, interviews, inspections, incident records and focus groups are all admissible. A survey is not required, but it offers two advantages that are hard to obtain otherwise: it lets the whole workforce take part, and it leaves a dated, methodologically defensible trail.

**FOR LEADERSHIP** The factors identified by the CNESST are also among the main determinants of team performance. Workload, autonomy, recognition, support and organizational justice explain a large share of productivity gaps. Compliance and performance rest on the same measurement.

# Psychosocial injuries rose 71% in four years

Figures published by the CNESST for 2020 to 2024 give a measure of the trend.

**6,667**

employment injuries related to psychosocial risks accepted by the CNESST in 2024, against 3,889 in 2020, a rise of **71%.**

**$236.3M**

in compensation costs paid by the CNESST for those injuries in 2024, against $128.5M in 2020, a rise of **84%**.

**409 days**

of compensation on average for an injury related to harassment, **more than thirteen months** of absence.

### The average cost of an injury

An injury related to stress represents **$42,096** on average, and one related to harassment, **$54,362**. The number of injuries related to harassment rose **156%** between 2020 and 2024, from 293 to 751.

### The cost of an offence

A failure to meet the obligations of the regime exposes a legal person to a fine of **$2,115 to $4,226** in 2026, and up to **$16,904** for a third or subsequent offence. Where the act or omission directly and seriously compromises a worker's health, safety or physical well-being, the range rises to **$21,127 to $84,519**, and up to **$422,596** for a third or subsequent offence.

### The cost that escapes the statistics

Beyond compensated injuries lies a loss that appears in no register. The disengaged employee who stays produces no claim, no complaint and no fine. They deliver below their capacity and slow their team down, without showing up in any of the organization's indicators. The factors Law 27 now requires employers to measure are precisely the ones that explain that gap.

# Concrete steps to comply with Law 27

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SELF-ASSESSMENT

# Ten questions to assess your file

Each of the statements below points to a requirement of the regime. Tick only what could be demonstrated, with supporting documents, during an inspection. This grid is a thinking tool. It is not an audit, legal advice or an attestation of compliance.

- [ ] The establishment has fewer than 20 workers, or 20 and more, and we know which mechanism applies.
- [ ] A written, dated prevention program or action plan exists and is applied.
- [ ] It covers every type of risk: psychosocial as well as physical, chemical, biological and ergonomic.
- [ ] Psychosocial risks were identified through a documented method rather than a general impression.
- [ ] Workers took part in that identification, and their participation can be demonstrated.
- [ ] Action priorities are ranked, with owners and a timeline.
- [ ] The measures chosen respect the hierarchy of prevention, starting with elimination at the source.
- [ ] The psychological harassment policy covers the elements of section 81.19 and is an integral part of the program or the plan.
- [ ] The health and safety committee, or the liaison officer, is designated, trained and active, and minutes are kept for at least five years.
- [ ] The program or the plan is updated every year, and the prevention program is filed with the CNESST every three years.

Whatever your score, the sticking point sits in the same place. **Documented identification of the risks is what makes analysis, the ranking of priorities and the demonstration of the process possible.**

WHERE TO START

# Identifying the risks conditions everything else

Most of the regulation's requirements rest on a single prerequisite. Risk analysis cannot happen without identification, and priorities cannot be ranked without analysis. Worker participation needs a channel through which to happen, the committee needs results to examine, and the demonstration of due diligence needs a documented starting point.

**That prerequisite is the identification of psychosocial risks.**

### A four-week schedule for the psychosocial component

| WEEK | WHAT IS DONE | WHAT IT UNLOCKS |
|---|---|---|
| **1** | Confirm the applicable threshold, designate the committee or the liaison officer, schedule the diagnostic | The participation mechanisms |
| **2** | Run the diagnostic across the teams | Risk identification and worker participation |
| **3** | Analyze the results and determine the priorities | The analysis, the ranking and the timelines |
| **4** | Draft the psychosocial component of the program or the plan, integrate the harassment policy, file the record | A documented trail for the psychosocial process |

**This schedule covers the psychosocial component only.** Compliance bears on the whole program or plan: physical, chemical, biological, ergonomic and safety risks, protective means, training and information, implementation of the measures and participation mechanisms. The psychosocial component is most often the one that is missing, but on its own it does not make a compliant file.

# One exercise for compliance and for management

A survey is not a requirement of the Act. It is one way among others to identify psychosocial risks, and the one that lets the whole workforce speak while leaving a dated trail of the process. That said, the same exercise can produce very different results depending on how it is run.

A questionnaire can produce a report that will not be much use, or a reading that tells each manager what to do with their team. Asking your whole workforce to take part is a real effort, so it may as well serve both the compliance file and the management of the teams.

That is the work Amélio does with its clients. Our diagnostic covers the psychosocial risk factors identified by the CNESST and rests on a model of **12 factors and 38 sub-factors**. In the same exercise, it produces what managers have long been looking for: the priorities to act on, team by team.

01

### A documented measurement

A structured questionnaire, an analysis of comments by artificial intelligence and a reading by at-risk group. The method can be explained and the process is dated, which makes it a solid piece of evidence in the file.

02

### Defensible priorities

We do not only ask employees whether they are satisfied with a given pillar, but also how much importance they place on it. Crossing the two shows where to act: a low score on a secondary pillar bothers no one, while an average score on a critical pillar is what makes your best people leave.

03

### Managers who are equipped

Each manager receives a picture of their team and a list of actions matched to their results. Measures stop being policies and become things people actually do in teams, where the regulation asks employers to act at the source.

04

### Support for due diligence

Diagnostic, priorities, plan, follow-up history and year-over-year comparisons. The psychosocial part of the file builds itself as you go, ready to be presented to the committee or to the CNESST.

**Not a survey. Not a report. Transformation that lasts.**

YOUR NEXT STEP

# Start your psychosocial risk diagnostic

A kickoff meeting, a structured questionnaire, analysis of the results and a presentation of the priorities. It is the first step of the prevention program, and the starting point of the action plans handed to each manager.


**Book your kickoff meeting**

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"Amélio made it possible to structure our engagement process and turn data into concrete levers for action."

**André Amyot, Vice-President Talent and Culture, Contrôles Laurentide**

Turnover down from 16% to 6.7% over 5 years, headcount up from 200 to 475 employees.

### 750 organizations

Proprietary sector benchmarks built on our field experience.

### Data held in Canada

Canadian hosting, SOC 2 Type 2 certification and Law 25 compliance, in support of your Law 27 obligations.

### People behind it

Organizational development advisors who work alongside your teams.