

SAFETY & HEALTH MANAGEMENT

GUIDELINES FOR EXCELLENCE

The background of the entire page is a collage of green US dollar bills, including \$100 and \$20 bills, arranged in a pattern that suggests wealth and value. The bills are slightly blurred and overlapping, creating a sense of depth and abundance.

Safety **PAYS**

The Oklahoma
Department of Labor

SAFETY & HEALTH M A N A G E M E N T

CONTENTS

POLICY PAGE 06	GOALS PAGE 12	LEADERSHIP PAGE 16	EMPLOYEES PAGE 22	AUTHORITY PAGE 26	RESOURCES PAGE 36	HAZARD PAGE 40
01	02	03	04	05	06	07
08	09	10	11	12	13	14
REPORTING PAGE 50	ANALYSIS PAGE 56	CONTROL PAGE 62	PLANNING PAGE 70	MEDICAL PAGE 74	TRAINING PAGE 84	REVIEW PAGE 92

with: INTRODUCTION: PAGE 02

INTERNET LINKS: PAGE 96

SELF WORKSITE SCORING: PAGE 97

Vision: A Safety Culture

The Oklahoma Department of Labor along with the Worker Safety Policy Council and other state leaders in safety and health have a vision:

Safety is ingrained in the culture of every Oklahoma workplace.

That sounds like a great vision statement, but what does it mean?

What is a Safety Culture?

In the Safety and Health industry, professionals use and promote this term as the way to long-term reductions of injuries and illnesses in the workplace.

A Safety Culture is a relatively simple concept:

- Safety is ingrained into every aspect of a company's operation.
- Each person in the organization believes they have a right to a safe workplace.
- Each person in the organization accepts responsibility for ensuring his/her own safety and health.
- Each person in the organization believes that he/she has a duty to protect the safety and health of their co-workers.
- Safety is considered a value in the organization.

Safety is not a Priority!

Traditionally, most managers have viewed safety as a priority - just one more thing in a list of many that must be considered when running a company or operation. This concept of safety as a priority is often reflected in safety slogans and speeches.

- Safety is our top priority!
 - Safety is #1!
 - Safety First!
-



Most professionals have only the best intentions when making these statements. However, the reality of running a business often interferes with this concept when priorities change minute by minute based on the needs or crisis of any given moment.

How many times during the day do your priorities change?

The dictionary defines a **priority** as a precedence established by order of importance or urgency.

But a **value** is defined as a principle, standard or belief considered worthwhile or desirable.

To say that safety is a priority, means that it will change based on the needs or urgencies of the moment and therefore, will not always be the top priority!

Safety is a Value!

But if we say that **Safety** is our **Value**. We are sending the message that safety and health will always be considered - no matter the priority. As our business focus and needs change on a daily basis, so will the needs and focus of safety. But it will always be present.

Why does a company need a Safety and Health program?

The basic purpose of any safety and health program is to prevent injuries and illnesses in the workplace.

Even OSHA's main purpose is "To assure safe and healthful working conditions for working men and women."

But even OSHA with their volumes of safety and health standards and regulations, recognizes that physical compliance with safety standards alone will not completely eliminate accidents, injuries and illnesses in the workplace. Additionally, it would be an impossible task for OSHA to attempt to write a safety or health regulation to address every possible or potential hazard in the workplace.

PUZZLE: By putting all the pieces of your safety program together you can create a complete safety culture at your organization. Each chapter begins with a puzzle piece icon to remind you that it is only a part of your complete safety program. When safety is a value - Safety Pays.

ATTRIBUTES **of** EXCELLENCE

WORKSITE SCORE:

When you use the attributes of excellence section of each chapter to score your organization, you build a better model of what you do the best and what aspects deserve more attention. The Worksite score form on the bottom of the page clearly explains how to determine your score.

Why? – Because people are in workplaces. Every organization with one or more employee has a wide variety of individuals with different backgrounds, personalities, physical characteristics, attitudes and behaviors. We all know that humans are fallible and that we can and do make mistakes every day.

OSHA along with the rest of the Safety and Health community has recognized that it takes a combined effort of physical safeguards, training, maintenance and good management practices to achieve safety and health success in an organization. Results have shown that companies with successful safety and health programs have similar traits:

Management Commitment & Employee Involvement

Without these two key elements, a safety and health program is likely to experience great difficulties in implementing improvements or achieving success.

What are the benefits of a Safety and Health program?

Obviously, a successful safety and health program will result in fewer injuries and illnesses in the workplace, but there are more rewards to be reaped from having a strong safety and health program:

- Lower worker's compensation costs and premiums
 - Cleaner safer workplace
 - Improved employee morale
 - More efficient work practices
 - Improved productivity
 - Lower operating costs
 - Higher profits
-

Does anyone really want un-safety?

Is there a company owner, **manager** or first line supervisor who wants their **employees** to be injured? Is there an employee alive who goes to work each day with the goal of **losing an arm**?

The reality of **un-safety** is that Accidents Cost! Not only do they cost **money** in the form of skyrocketing worker's **compensation** and medical costs, but there are also the indirect costs such as hiring and retraining new employees, repairing or replacing **damaged** equipment, or the loss of production. But even more importantly the **human** costs of un-safety. **Pain** and suffering to injured employees, the toll it takes on the family unit and our society can sometimes be the most damaging.

With this **Workplace Safety and Health Program guidebook**, we intend to provide you with basic information to establish and maintain a successful safety and health program at your company or organization.

This book goes beyond what is required by OSHA for compliance with safety and health regulations. Hopefully, once you review the individual chapters and sample information, you will be able to determine what your company's safety culture will be, then begin the process of making it happen.

Worksite Safety & Health Policy

OBJECTIVE: *State clearly*

a worksite policy on safe

and healthful work and

working conditions, so

that all personnel with

responsibility at the site

and personnel at other

locations with

responsibility for the site

understand the priority

of safety and health

protection in relation to

other organizational

values.

What is a safety and health policy?

A safety policy establishes the “vision” for safety and health at your company.

A statement of safety and health policy can vary in length and content. The written Policy Statement generally starts with a clear, simple expression of your concern for and attitude about employee safety and health. Its purposes are:

- to clarify policy;
- to create consistency and continuity;
- to serve as a checkpoint whenever safety and health appear to conflict with production or other priorities and;
- to support supervisors in their enforcement of safety and health rules and safe work practices.

The Policy Statement is the cornerstone of your safety and health program and must have the commitment of both management and employees.

Contents of a Policy Statement

Your Policy Statement should be organized to adequately satisfy your specific intent.

Generally, a **five-part** outline is used for organizing a Policy Statement. This format ensures that the following required items are addressed:

- Introductory Statement
- Purpose/Philosophy
- Management Responsibilities
- Employee Responsibilities
- Closing Statement



POLICY

Introductory Statement

The written Policy Statement generally starts with a clear, simple expression of your concern for and attitude about employee safety and health.

EXAMPLE: *“This company considers no phase of its operation or administration more important than safety and health. We will provide and maintain safe and healthful working conditions, and we will establish and insist on safe work methods and practices at all times.”*

EXAMPLE: *“This organization has always believed that its employees are its most important asset. We will always place a high priority on safe operations and on the safety and health of employees.”*

Purpose/Philosophy

An effective safety and health program will have a stated purpose or philosophy. This is included in the written Policy Statement so that both you and your employees are reminded of the purpose and value of the program.

EXAMPLE: *“Safety and health protection shall be an integral part of all operations, including planning, procurement, development, production, administration, sales and transportation. Accidents and health hazard exposures have no place in our company.”*

EXAMPLE: *“We will involve both management and employees in planning, developing and implementing safety and health protection.”*

Management Responsibilities

Your safety and health program will describe in detail who is to develop the program and make it work, as well as who is assigned specific responsibilities, duties and authority. The Policy Statement may include a summary of these responsibilities.

EXAMPLE: *“Each level of management must reflect an interest in organizational safety and health and must set a good example by complying with organization rules for safety and health protection. Management interest must be vocal, visible and continuous from top management to departmental supervisors.”*

EXAMPLE: *“Management representatives who have been assigned safety and health responsibilities will be held accountable for meeting those responsibilities.”*

Employee Responsibilities

Many organizations acknowledge the vital role of their employees in the operation of a successful safety and health program by summarizing employee roles and contributions in the Policy Statement.

EXAMPLE: *“All employees shall follow safe working practices, obey rules and regulations and work in a way that maintains the high safety and health standards developed and sanctioned by the organization.”*

EXAMPLE: *“All employees must recognize their responsibility to prevent injuries and illnesses and must take necessary actions to do so. Their performance in this regard will be measured along with their overall performance.”*

Closing Statement

The closing statement is often a reaffirmation of your commitment to provide a safe and healthful workplace. It also may appeal for the operation of all employees in support of the safety and health program.

WORKSITE SAFETY AND HEALTH POLICY

EXAMPLE: *“All employees are encouraged to make this safety and health program an integral part of their daily operations.”*

EXAMPLE: *“By accepting mutual responsibility to operate safely, we all will contribute to the well-being of one another and, consequently, this organization.”*

Example Policy Statement

The Policy Statement should be brief and must contain the five items discussed above. Your company's written Policy Statement should be signed by the top company official or organization head and be communicated to all employees. The following is an example of a complete safety and health Policy Statement:

EXAMPLE SAFETY AND HEALTH POLICY STATEMENT

“This organization considers no phase of its operation more important than safety and health protection. We will provide and maintain safe and healthful working conditions and establish and insist upon safe work methods and practices at all times.”

“Safety and health shall be an integral part of all operations, including planning, procurement, development, production, administration, sales and transportation. Accidents have no place in our organization.”

“We will work consistently to maintain safe and healthful working conditions; to adhere to proper operating practices and procedures designed to prevent injury and illness; and, to comply with federal, state, local, consensus standards and company safety and health regulations.”

“Each level of management must reflect an interest in company safety and health objectives and is required to set a good example by always observing the rules as a part of the normal work routine. Management interest must be vocal, visible and continuous, from top management to departmental supervisors.”

“All employees shall follow safe working practices, obey rules and regulations and work in a way that maintains the high safety and health standards developed and sanctioned by the organization.”

“We urge all employees to make our safety and health program an integral part of their daily operations. Then, the total elimination of accidents and injuries will become not just an objective but a way of life.”

ATTRIBUTES **of** EXCELLENCE

1. Yes No There is a policy that promotes safety and health.
2. Yes No The policy is available in writing.
3. Yes No The policy is straight forward and absolutely clear.
4. Yes No The policy is supported by senior management.
5. Yes No The policy can be easily explained or paraphrased by others within the workforce.
6. Yes No The safety and health policy is expressed in the context of other organizational values.
7. Yes No The policy statement goes beyond compliance to address the safety behavior of all members of the organization.
8. Yes No The safety and health policy guides all employees in making a decision in favor of safety and health values and priorities.

WorksiteScore

Total number of "Yes" responses:

÷

Total number of responses:

=

Divide number of "Yes" responses by total number of responses

x100 =

Multiply by 100 = your score

 %

Goals and Objectives

OBJECTIVE: *Establish and communicate a clear goal for the safety and health program and objectives for meeting that goal, so that all members of the organization understand the results desired and the measures planned for achieving them.*

Goals

The policy statement has established the need for a safety and health program. Now you are ready to set a goal. A goal gives the direction you will take to reach your destination in occupational safety and health. It is the result toward which your program strives.

Goals can be either numerical or descriptive. Numerical goals, as the name implies, are goals which can be measured in the form of numbers.

EXAMPLE: “A goal of zero hazards at any time.”

Descriptive goals are not numerical but can also be sufficiently inclusive and still attainable.

EXAMPLE: “A comprehensive program that assesses all existing and known potential hazards of your worksite and prevents or controls these hazards.”

Objectives

Goals can only be achieved by setting objectives. Objectives are the specific paths you will follow to achieve a goal. They are statements of results or performance. They are short, positive steps along the way to your organization’s goals.

Workplace objectives for safety and health are similar to those for other organizational functions. They identify What? When? How much?

GOALS AND OBJECTIVES



GOALS

Setting goals and objectives will determine whether your safety and health program is effective. Begin to develop meaningful objectives by answering these questions:

- Where do you want to be?
- Where are you now?
- What must be done to get from where you are to where you want to be?

The most successful goals and objectives have the following characteristics:

- Relates directly to the accountable manager's role in the organization;
- Is readily understandable by those who will be contributing to its attainment;
- Is realistic and attainable, but represents a significant challenge;
- Provides maximum payoff on the required investment of time and resources when compared with other objectives being considered;
- Is consistent with available or anticipated resources; and,
- Is consistent with basic organizational policies and practices.

An example of an objective that may be consistent with your basic safety and health plan is as follows:

EXAMPLE: *“Conduct weekly inspections with emphasis on good housekeeping, proper use of protective equipment, condition of critical parts of equipment and preventive maintenance.”*

Communicate objectives. To be effective, your safety and health goals and objectives must be communicated to all employees. This will help to ensure that all employees understand what is expected of them. Communication will also reaffirm the organization's commitment to safety and health.

Review objectives. You should review your objectives regularly by asking these questions:

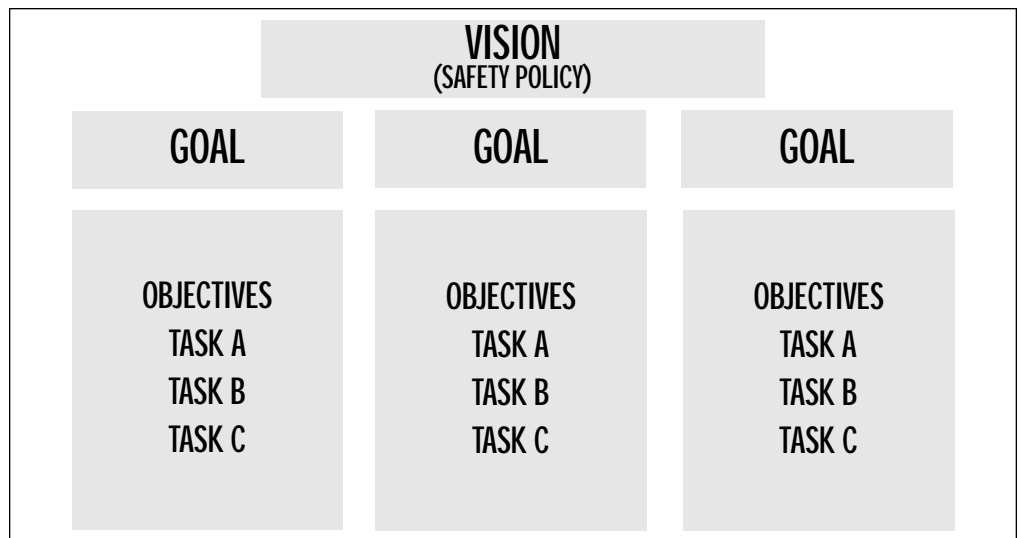
- Are you getting the desired performance from supervisors and employees?
- Are objectives being achieved?
- Are the results moving you toward your goal?

Any program or activity in which you invest time and resources on a continuing basis should prove its worth. If an objective has been achieved, but there continue to be “too many injuries, too many close calls, too many unsafe acts, or no improvement in conditions,” then different or additional objectives are needed.

Summary

Your safety and health program deserves to be carefully thought out and directed. The following guidelines may help:

- Write and communicate your safety and health policy.
- Determine the direction of your safety and health program.
- Set and communicate a goal for your program.
- For each goal, identify at least one objective which will assist the organization in achieving the goal.
- Review your safety and health program periodically.



ATTRIBUTES **of** EXCELLENCE

1. Safety and health goals exists in writing. Yes No
2. The goals relate directly to the safety and health policy or vision. Yes No
3. The goals incorporate the essence of “a positive and supportive safety system integrated into the workplace culture” into its language. Yes No
4. The goals are supported by senior management and can be easily explained or paraphrased by others within the workplace. Yes No
5. Objectives exist which are designed to achieve the goals. Yes No
6. The objectives relate to deficiencies identified in periodic assessments or reviews. Yes No
7. The objectives are clearly assigned to responsible individuals. Yes No
8. A measurement system exists which reliably indicates progress on objectives toward the goals. Yes No
9. The measurement system is consistently used to manage work on objectives. Yes No
10. The objectives can be easily explained by others within the workplace. Yes No
11. Measures used to track objectives progress are known to the workforce. Yes No
12. Members of the workforce are active participants in the objectives process. Yes No

WorksiteScore

Total number of “Yes” responses:

÷

Total number of responses:

=

Divide number of “Yes” responses by total number of responses

x100 =

Multiply by 100 = your score

 %

Management Leadership

OBJECTIVE: *Provide visible top management involvement in implementing the program, so that all will understand that management's commitment is serious.*

Leadership is an active state which changes values and systems and pulls us into the future.

Management is a passive state which keeps the organization operating in the present.

“Management commitment to safety is the major controlling influence in obtaining success (in safety).” – National Institute for Occupational Safety and Health

“Safety leadership is where executives exhibit ‘profound knowledge’ – an understanding of what’s right – and proactive involvement – a willingness to act on what’s wrong.” – Larry Hansen

Leadership Technique

Leadership provides the motivating force within the organization; therefore, leadership must come first, then management. Managers use a variety of techniques that visibly demonstrate commitment to workplace safety and health. These techniques must demonstrate involvement.

Means of showing involvement, and examples of each, are as follows:

Taking charge

- Let it be known throughout the community that only safe and healthful work is acceptable at your organization.
- Attend safety organization meetings outside your area.
- Participate in a volunteer group promoting various safety topics.
- Set an example.
- Follow the rules and regulations.
- Participate in or lead safety and health committees.
- Make presentations on safety and health topics.
- Conduct inspections.

MANAGEMENT LEADERSHIP



LEADERSHIP

- Reward best safety/health suggestions at regular intervals.
- Being visible – Make “walk-through inspections.”

NOTE: *This will also allow you to interview employees to gather their perception of how management and supervisors are following and applying safety and health practices.*

Being accessible

Have an *open door* policy to discuss employee concerns about safety and health issues without fear of reprisal.

Listen to employee concerns and follow-through to correct hazards.

Summary

Your visible commitment to safety and health can have a great impact on the quality and success of your organization’s program. A number of options are available for showing your commitment and involvement, and that of other managers. A lack of visible commitment and involvement (leadership) by top management will undermine your safety and health program and will seriously reduce your organization’s chances of achieving its goals.

1

The Safety and Health Leadership Quiz

Leadership is personal and specific to the individual and culture in which the individual operates. However, when it comes to safety and health in the workplace, there tend to be some common characteristics of an effective leader. The following 25 items will help open a window into your safety and health leadership approach.

2

Now that you have completed the quiz, count the number of check marks in each column and write the total in the appropriate box to the right.

Multiply the number in each column by the number shown.

Write the result in the appropriate box below.

Add the total of the four boxes and put the result in the box below.

This is your total score.

Results

As a general rule, the closer your score comes to 100, the stronger your safety and health leadership skills.

If your score is less than 51, you are fairly traditional in your approach to management and probably tend to hold a fairly tight rein on your control of operations. To improve your score, consider reading one or two of the recent crop of books on leadership. Ask a friend at a progressive company or someone at your local Chamber of Commerce or employer's association to recommend one. Spend some time in the plant asking people how they feel about you and the culture of the organization. Be patient, listen without being defensive, select two or three approaches suggested by the quiz and try them for a while. If you see results, select some more and try them also. This will be hard work, but the more time you spend with your people during this process, the more they will reinforce and encourage you.

If your score between 51 and 74, you're in the transition zone to a new style of management. To improve, spend some more time learning leadership skills. Look at the quiz and select several areas where you answered "strongly disagree." Try to understand why you act or feel that way and work on changing your approach. As you make some progress, find other areas where you disagreed or strongly disagreed and work on those. Be patient and be sure to get feedback from your people on how you are doing.

If you score 75 or higher, you are probably operating in a fairly positive, empowered environment and are viewed as a leader by your people. To improve, look at areas where you scored less than strongly agree and understand why. Get your people involved in helping you improve. They are probably already interested and supportive and will welcome the opportunity to enhance your effectiveness and that of the organization.

ATTRIBUTES **of** EXCELLENCE

Management Leadership

1. Yes No The positive influence of management is evident in all elements of the safety and health program.
2. Yes No Members of the workforce perceive management to be exercising positive leadership.
3. Yes No Members of the workforce can give examples of management's positive leadership.

Management Example

4. Yes No All managers know and understand the safety and health rules of the organization and the safe behaviors they expect from others.
5. Yes No Managers throughout the organization consistently follow the rules and behavioral expectations set for others in the workforce as a matter of personal practice.
6. Yes No Members of the workforce perceive management to be consistently setting positive examples and can illustrate why they hold these positive perceptions.
7. Yes No Members of management at all levels consistently address the safety behavior of others by coaching and correcting poor behavior and positively reinforcing good behavior.
8. Yes No Members of the workforce credit management with establishing and maintaining positive safety values in the organization through their personal example and attention to the behavior of others.

WorksiteScore

Total number of "Yes" responses:

÷

Total number of responses:

=

Divide number of "Yes" responses by total number of responses

x100 =

Multiply by 100 = your score

 %

Employee Involvement

OBJECTIVE: *Provide for and encourage employee involvement in the structure and operation of the program and in decisions that affect their safety and health, so that they will commit their insight and energy to achieving the safety and health program's goal and objectives.*

Why should employees be involved?

Involving your employees directly affects their safety and health and is the right and smart thing to do.

Rank and file workers are the persons most in contact with potential safety and health hazards. They have a vested interest in effective protection programs.

Recent experience has demonstrated that line workers and others in similar positions make highly valuable problem solvers.

Group decisions have the advantage of the group's wider field of experience.

Research shows that employees are more likely to support and use programs in which they have had input.

Employees who are encouraged to offer their ideas and whose contributions are taken seriously are more satisfied and productive on the job.

How can employees help?

Conduct site surveys.

Assess routine hazards in each step of a job or process and prepare safe work practices or controls to eliminate or reduce exposure.

Develop and revise the site safety and health rules.

Train both current and newly-hired employees.

Provide programs and presentations at safety and health meetings.

Conduct accident/incident investigations.

Participate on committees and other advisory or specific-purpose groups.



EMPLOYEES

Guidelines for forming committees

Try to include equal numbers of management and non-supervisory employees.

Choose management members who can get things done.

If your workplace is not unionized, you may wish to solicit employees' suggestions on how to select non-supervisory members of the committee.

NOTE: Consult with your human resources experts before holding an election for Safety Committee members. These employees may volunteer and be put on a rotational basis to extract as much information and knowledge from as many employees as possible. It would be prudent that your attorney be contacted if you are unsure of your status.

Guidelines for involving employees

Give employees (1) the opportunity for participation, (2) clear signals from management and (3) needed training and resources.

Take employees seriously and communicate that a safe and healthful environment is a condition of employment.

Implement employee suggestions in a timely manner or take the time to explain why they cannot be implemented.

Include in your policy that employees are protected from harassment resulting from safety and health program involvement.

Make sure that all employees hear about the success of other employees' ideas.

ATTRIBUTES **of** EXCELLENCE

1. Yes No Employees accept personal responsibility for ensuring a safe and healthful workplace.
2. Yes No The employer provides opportunities and mechanism(s) for employees to influence safety and health program design and operation.
3. Yes No There is evidence of management support of employee safety and health interventions.
4. Yes No Employees have a substantial impact on the design and operation of the safety and health program.
5. Yes No There are multiple avenues for employee participation.
6. Yes No The avenues are well known, understood and utilized by employees.
7. Yes No The avenues and mechanisms for involvement are effective at reducing accidents and enhancing safe behavior.

WorksiteScore

Total number of "Yes" responses:

÷

Total number of responses:

=

Divide number of "Yes" responses by total number of responses

x100 =

Multiply by 100 = your score

 %

Responsibility, Authority & Accountability

OBJECTIVE: *Assign and*

communicate

responsibility for all

aspects of the program

so the managers,

supervisors and

employees in all parts of

the organization know

what performance is

expected of them.

Hold managers,

supervisors and

employees accountable

for meeting their

responsibilities, so that

essential tasks will be

performed.

The need for delegation

As your company grows, the responsibilities for the details of the safety and health program become too many for one or two employees to shoulder. Therefore, it is important to have a mechanism for delegating some of that responsibility. Everyone in an organization is responsible for workplace safety and health. Clearly assigning safety and health responsibility, authority and accountability is necessary to ensure the effectiveness and flexibility of your program.

Value of the job description

One of the most-used tools for describing each person's overall employment is the job description. An individual job description describes the most important characteristics and responsibilities of a position.

Written job descriptions can effectively:

- Clarify the specific safety and health responsibilities and authority of individuals;
- Distribute responsibilities between supervisors and rank and file employees;
- Remove any doubt about the responsibility and authority of each position;
- Enhance communication and coordination among jobs;
- Aid in determining whether all responsibilities have been accounted for and whether new tasks should be assigned;
- Aid in developing job performance objectives and performance measurements; and,
- Assist in the legal aspects of employment situations.



AUTHORITY

Examples

PRESIDENT / OWNER / SITE MANAGER

Establish a policy to hold the worksite in compliance with all applicable federal or state standards and provide safe and healthful work and working conditions for every person at the site.

Provide the leadership and resources to carry out the stated company safety and health policy.

Set objectives and support safety and health personnel and employees generally in their requests for information, training, experts, facilities, tools and equipment needed to conduct an effective program and to establish a safe and healthy workplace.

Assign clear responsibility for the various aspects of the safety and health program. Ensure that employees with assigned responsibilities have adequate resources and authority to perform their duties.

Require all vendors, customers, subcontractors and visitors to comply with the company safety and health policy.

FIRST LINE SUPERVISORS

Supervise and evaluate worker performance, including each worker's safety and health behavior and work methods.

Encourage and actively support employee involvement in the safety and health program. Provide positive reinforcement and recognition to outstanding individual and group performance.

Obtain and maintain up-to-date knowledge and skills required to detect safety and health hazards including improperly functioning machinery, tools, or equipment.

Maintain good housekeeping in your work area.

Ensure that the plant preventive maintenance program is being followed and that any repair and replacement needs found during those activities are tracked to completion.

Actively discourage short cuts. Consistently and fairly enforce safe work procedures and safety and health rules.

Make sure each employee knows what to do in case of an emergency.

EMPLOYEES

Learn the rules. Understand them. Follow them and avoid short cuts.

Review the safety and health educational material posted on bulletin boards and distributed to work areas.

Be certain that you completely understand instructions before starting work.

If you have any doubt about the safety of a task, stop and get instructions from your supervisor before continuing.

Make sure you understand exactly what your responsibilities are in emergency situations.

SAFETY AND HEALTH DIRECTOR / COORDINATOR

Continue to develop and maintain safety and health expertise.

Stay informed of new laws and standards dealing with employee risk reduction in this industry and illness and injury recordkeeping requirements.

Evaluate the plant's preventive maintenance program's effectiveness in ensuring a safe and healthful workplace.

RESPONSIBILITY, ACCOUNTABILITY & AUTHORITY

Conduct a hazard analysis that includes hazard detection; and, plans for hazard prevention or control for existing equipment and whenever new equipment, facilities, or materials are designed, purchased or used; and, whenever new processes are designed.

Assist in or oversee the development of a system for consistent and fair enforcement of the rules and safe work practices.

Assist management in providing adequate equipment for personal protection, industrial hygiene, safety and fire prevention.

Inspect and/or assist in inspection of facilities to detect hazards that may have escaped established prevention and control mechanisms and uncover any previously undetected hazards.

Investigate or oversee investigation of employee reports of hazards. Respond to employee safety and health suggestions.

GUIDELINES FOR DEVELOPING JOB DESCRIPTIONS

Review your existing organizational structure.

Determine what role each position should play in your overall program and what level of authority and resources will be needed.

Determine and assign responsibilities and write them into each position's description.

Communicate with the employees involved by discussing the responsibilities in face-to-face meetings and by documentation.

Provide adequate authority and resources to responsible parties, so that assigned responsibilities can be met.

NOTE: Any realistic assignment of responsibility must be accompanied by needed authority and resources.

Benefits of Accountability

A system of accountability ensures everyone on the team fulfills their responsibilities. It also provides a means for employees to understand how critical their performance is and to teach them to take personal responsibility for their performance. The accountability segment aims to teach your managers and supervisors to take personal responsibility for their actions, consequences and the subsequent effect of these actions on the work team.

When you ask employees what happens to those who violate safety and health rules or safe work practices, do they indicate that rule-breakers are clearly and consistently held accountable?

When asked what happens when rules are broken, do hourly employees complain that supervisors and managers do not follow rules and are never disciplined for infractions?

Defining expected performance in written objectives

Before you hold people accountable, you must define what is expected. Performance objectives must be attainable, clearly stated, realistic, challenging and measurable. It is also essential that required performances be supported by sufficient resources.

EXAMPLE: *“The employee will be able to describe how a respirator works and when it should be used.”*

Periodically evaluate required performances jointly with individual employees.

Allow all employees the freedom to learn and develop in a positive, non-threatening atmosphere.

Evaluation of performance objectives

Periodically review the performance objectives to make sure you are getting the desired performance and results. For instance, if a

RESPONSIBILITY, ACCOUNTABILITY & AUTHORITY

supervisor meets the objectives, but the department continues to have too many accidents, too many close calls or little improvement in conditions, then the objectives must be revised.

Performance evaluations can be oral, written or both.

An effective evaluation will include the following critical elements:

- Evaluation should be performed at specified intervals.
- Evaluation always should be performed against a backdrop of previously defined objectives.

Ideally, the evaluation can be an opportunity for the evaluator and the person being evaluated to explore ways of improving both the performance of the system and the individual.

The goal of the evaluation should be to encourage personal responsibility and the individual's efforts toward improving the performance of the team.

Both parties must be able to come to some agreement on needed changes in objectives or performance.

Agreed upon changes must be incorporated into the existing performance objectives.

Some pre-determined consequence for poor performance must begin after a certain point.

Some task monitoring may be necessary to support the performance evaluation. This task monitoring can form the substance of later performance evaluations.

EXAMPLE: You may need to monitor a supervisor's accident investigations after each accident, until it is clear that the supervisor has developed the necessary skills.

The complexity and formality of your evaluations should be consistent with the rest of your safety and health program.

Set consequences for failure to perform adequately. At first, as the employee learns new skills and changes behavior patterns, consequences for poor performances should be nil or minimal.

Instead, use positive reinforcement during this initial phase of performance evaluation to encourage your employee’s natural desire to do well and to be recognized.

Although the goal of any accountability program should be to develop a sense of personal accountability for actions, individuals often need to know that there are negative consequences for poor performance. Consequences reinforce the importance of meeting objectives.

Consequences

Positive reinforcement of positive performance encourages your employees’ desire to do well and be recognized. Such reinforcement should be implemented as often as necessary before resorting to the negative consequences.

NOTE: *Use the four to one ratio. Provide positive reinforcement 4 times more than correction criticism or discipline.*

Employees should understand and deserve to have, a clear meaning of the nature, severity and timetable of consequences. There should be no surprises.

Enforce negative consequences only as a last resort.

Consequences will depend on each situation and worksite and should refer to applicable laws.

The most common positive consequences include:

Verbal praise
Thank yous
Written Commendations
Safety Awards
Incentives
Celebrations

The most common negative consequences include:

Coaching
Counseling
Written Reprimand
Suspension or Demotion
Termination

ATTRIBUTES **of** EXCELLENCE

Responsibility

1. All elements of the company's safety and health program are specifically assigned to a job or position for coordination. Yes No
2. Assignments are in writing. Yes No
3. Each assignment covers a broad range performance expectations. Yes No
4. All personnel with program assignments are familiar with their responsibilities. Yes No
5. Authority to meet assigned responsibilities exists for all personnel. Yes No
6. Authority is granted in writing. Yes No
7. Authority is exclusively within the control of the individual holding the responsibility. Yes No
8. Personnel believe they actually have the authority granted to them. Yes No
9. Personnel understand how to exercise the authority granted to them. Yes No
10. Personnel have the will to exercise the authority granted to them. Yes No
11. Responsibilities are being met appropriately and on time. Yes No

ATTRIBUTES **of** EXCELLENCE

Accountability

12. Yes No All personnel are held accountable for meeting their safety and health responsibilities.
13. Yes No Methods exist for monitoring performance of responsibilities.
14. Yes No Failure to meet assigned responsibilities are addressed and result in appropriate coaching and/or negative consequences.
15. Yes No Personnel meeting or exceeding responsibilities are appropriately reinforced for their behavior with positive consequence.
16. Yes No Data related to key elements of safety and health performance are accumulated and displayed within the workplace to inform all personnel of progress being made.
17. Yes No Accountability data are used by individuals and teams to revise goals and objectives to facilitate continuous improvement in safety and health.

WorksiteScore

Total number of "Yes" responses:

÷

Total number of responses:

=

Divide number of "Yes" responses by total number of responses

x100 =

Multiply by 100 = your score

 %

Resources for Safety and Health

OBJECTIVE: *Provide*

adequate authority

and resources to

responsible parties,

so that assigned

responsibilities can

be met.

Types of Resources

Resources may include, but are not limited to:

- appropriately trained and equipped personnel (employees and outside consultants).
- sufficient operational and capital funding.
- sources for quality inventory.

Can you afford not to have adequate resources?

Do employees talk about not being able to get safety and health improvements because of their cost?

Do employees talk about the need for more safety and/or health personnel or consultants?

Are your goals for a budget increase being denied?

Possible cost reductions

- Medical and insurance expenses
- Worker's compensation
- Lost productivity
- Losses due to absenteeism and turnover
- Equipment damage and waste of materials due to inefficient operations or carelessness



Cost reductions through improved use of resources

RESOURCES

Implementing controls often leads to less-than-anticipated results. Industry puts its best efforts into finding those resources that meet standards at the lowest possible cost. Examples include:

- Reducing costs through good maintenance and housekeeping
- Reducing costs by installing controls for a hazard which may make it less costly to control other hazards
- Reducing costs by finding less expensive engineering controls than originally thought possible

ATTRIBUTES **of** EXCELLENCE

1. Yes No Adequate resources (personnel, methods, equipment, funds) to meet responsibilities are available to all personnel.

2. Yes No Necessary resources are exclusively with the control of the individual holding the responsibility.

3. Yes No Resources are being effectively applied by all personnel in order to meet responsibilities.

WorksiteScore

Total number of "Yes" responses:

÷

Total number of responses:

=

Divide number of "Yes" responses by total number of responses

x100 =

Multiply by 100 = your score

 %

Hazard Identification

OBJECTIVE: *So that all*

hazards are identified:

Conduct comprehensive

baseline worksite

surveys for safety and

health and periodic

comprehensive update

surveys. Analyze

planned and new

facilities, processes,

materials and

equipment.

Systems for hazard identification

Are you aware of the existing and potential hazards in your organization? If not, you must be able to systematically identify these hazards.

Examples include the following:

- Periodic, comprehensive safety, industrial hygiene and health surveys;
- Analysis of potential hazards relating to changes (new or planned facilities, equipment, materials and processes);
- Routine hazard analysis, such as job hazard analysis, process hazard analysis, or phase hazard analysis; and,
- Regular site inspections.

Comprehensive survey (baseline)

Surveys are not the same as inspections. **Inspections** are often performed by employees at the workplace. **Surveys** should be performed by people who can bring to your worksite fresh vision and extensive knowledge of safety, health and industrial hygiene. Although not required, survey services may be provided by outside experts. If you use experts from within your organization, beware of “tunnel vision” which can prevent the recognition of hazards in areas not directly related to routine functions. Bringing in a person from the outside can provide a fresh outlook and transfer experience from other facilities which could complement the survey.

Periodic surveys can follow the initial survey, at intervals appropriate to the size and complexity of your workplace. These surveys will allow you to take advantage of any new engineering or scientific knowledge of hazards and their prevention. They will also help you find new hazards that have evolved with changing work processes and procedures.

HAZARD IDENTIFICATION



HAZARDS

The safety professional, industrial hygienist or occupational health professional will (among other tasks): Look into the processes of your facilities; watch each operation; talk with employees; check inventory of chemicals; inspect welding operations; evaluate smoking areas; review respirator maintenance and the training of personnel; conduct shift sampling for air contaminants and noise measurements; conduct an ergonomic assessment; and, make suggestions for improving the monitoring of health issues.

What to look for in a surveyor.

- What type of training have they completed?
- Do they have references?
- Where have they surveyed in the past?

What to look for when initiating your survey:

Have any incidents occurred? Do any patterns exist?

NOTE: Start with the OSHA 200 or OK 200 Log. Employers are required to record information about every occupational death, every non-fatal occupational illness and those non-fatal occupational injuries that involve one or more of the following: loss of consciousness, restriction of work or motion, transfer to another job, or medical treatment other than first aid.

Are applicable written safety programs (i.e. hazard communication, hearing conservation) in place?

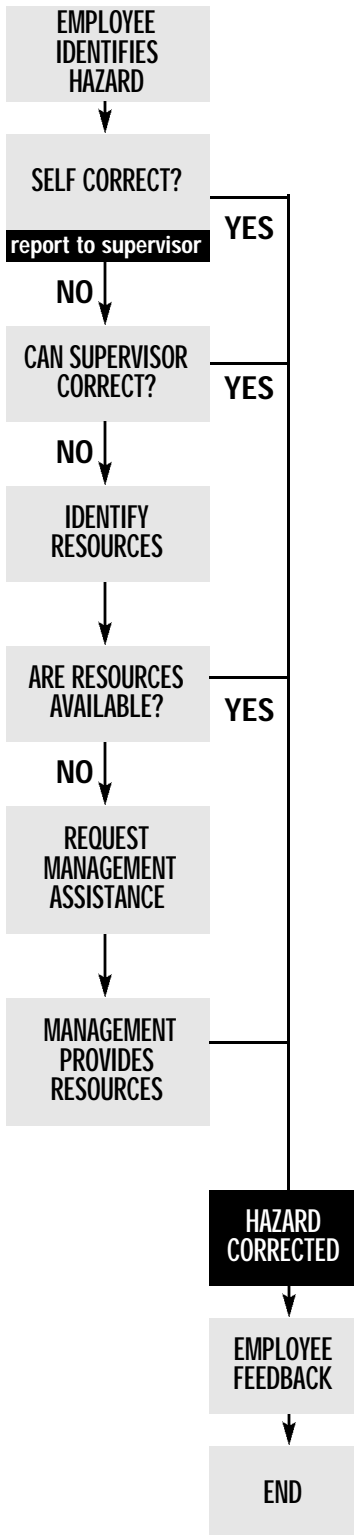
Are records of employee visits to clinics or first aid stations available?

Are training records maintained?

Are safety programs communicated to employees?

Are required posters, warning signs and tags in use?

HAZZARD IDENTIFICATION FLOWCHART



Hazard analysis: opportunities for change

Heading off a problem before it develops is usually less expensive than fixing it after the fact. (Pro-active planning is one goal of this workbook.) Many hazards can result from changes at the workplace. These changes can introduce potential hazards. Opportunities for analyzing potential hazards resulting from changes at the workplace include the following:

When leasing equipment or buildings

Leased facilities were often designed and constructed for other purposes. The design of the building and its age can increase the potential for health and safety problems. For example, asbestos may be present in the building. Hurried renovations may have caused basic considerations to be overlooked, such as repairing a loose railing. Before leasing property, review the facility and any blueprints or plans for renovations.

When purchasing new equipment and materials

Equipment manufacturers often do not know how their products will be used at your workplace. Therefore, you cannot rely completely on the manufacturer to have analyzed the potential hazards and to have designed controls or safe procedures for the product. (If the equipment was produced outside the United States, it must also be checked for conformity with applicable U.S. standards and laws.) New materials can be hazardous or can introduce new hazards to the work processes in which they are used.

When introducing new processes

New processes require employees to perform new tasks. Even if employees are using familiar materials, equipment and facilities in the new process, new hazards may develop.

When workers or staff change

Whenever one employee is replaced by another, the difference in skill and expertise can lead to greater risks both to the new worker and to co-workers.

HAZARD IDENTIFICATION

When individual workers change (not a staffing change)

Changes in an employee's health, ability to function on the job and personal life can affect workplace safety and health. These changes may be sudden or gradual. Organizations must be sensitive to such changes and provide orientation and training, physical or administrative adjustments, or other accommodations.

Types of routine hazard analysis

Job Hazard Analysis or Job Safety Analysts (JSA) is a process of breaking down a specific job into its component steps and listing them in order. From this point, you can determine whether the job could be done without any hazards, as well as the steps to take to eliminate the hazards. (The analysis and any resulting steps should be reviewed with the affected employee to maximize employee participation.)

Process Hazard Analysis is any series of actions or operations that convert raw material into a product. These materials may be the raw product entering the facility, intermediate product, final stage, by-products or waste material. This includes any use, storage, manufacturing, handling, or on-site movement of such chemicals, or a combination of these activities.

You may want to consider hiring an expert to facilitate more complex process methods of hazard analysis, such as: **Failure Mode and Effect Analysis, Fault Tree Analysis** and **Hazard Operability** studies.

EXAMPLE: Mechanical and chemical operations; low and high-temperature operations; possible radiant energy; direct contamination of employees; contamination of air with toxic materials.

Tools for process hazard analysis

Process hazard analysis should be performed by a team. This team should represent different disciplines, opinions and perspectives. No single person will have all of the knowledge and experience necessary. In addition, the varied backgrounds, opinions and perspectives will be contributed to the analysis.

The following “tools” can be used by the team to conduct process hazard analysis:

Flow charts - Flow charts allow for both a visual and a verbal description of each step in a process. The flow chart relates each step to the others. A process flow chart can reveal considerations not included in a purely descriptive overview of a process.

Worker exposure levels - This analysis involves looking at each employee’s work actions and locations throughout the workday. Questions must be asked about the worker’s potential exposure to hazards. With what substances and equipment does the worker interact? Do the worker’s actions create a hazard for the worker or for others? In addition, employee exposures to physical agents (such as microwave radiation) and air contaminants must be measured. Results of this analysis lead to recommendations for preventive measures and controls, including engineering controls, work practices and personal protective equipment as needed.

Tools for preparing for unplanned events

“What if” Analysis - This analysis starts by identifying the points in a process where something could go wrong. Then, you determine what else could happen and what the possible outcomes could be. Analysis of this data leads to recommendations for preventive measures and controls. A checklist of common hazards could be implemented with this tool.

NOTE: It is not enough to analyze only those hazards associated with normal operations. You must also analyze the hazards associated with unplanned events, especially when dealing with high hazard chemicals or volatile explosives. The following tools will help you determine possible process breakdowns and design preventive measures and controls to prevent them.

EXAMPLE: Team members could be assigned specific aspects of the process under analysis. Each part of the process could then be analyzed against a checklist covering operator practices and job knowledge, suitability of equipment and materials, the chemistry of the process and its control systems, operating and maintenance records and other points.

HAZARD IDENTIFICATION

Regular site inspection – Regular site inspection involves a general inspection of all parts of the worksite, including industrial hygiene and sampling.

- **When to inspect?**

Construction sites should be inspected weekly. Other worksites should have quarterly and some areas monthly inspections, with follow-up on needed changes.

- **What to inspect?**

Use a checklist to analyze engineering controls (i.e. guards on equipment), ventilation systems and personal protection equipment.

- **Who should inspect?**

Supervisors

Employees (to inspect other worker's sites).

This increases the chances of locating hazards.

Importance of employee involvement

Your organization will benefit from involving employees in efforts to inventory workplace hazards. Hazard surveyors will benefit from the knowledge of employees. In addition, as employees learn more about workplace hazards, prevention and control, they will become better able to protect themselves and others.

Employees have special knowledge gained from their close involvement with equipment, materials and processes. They also frequently participate in change analysis of new equipment and/or processes, due to their insights into how things really work.

Eight Questions for Correcting a Hazard

- Has a true hazard been identified?
- Has it been corrected?
- Which methods would best identify similar hazards?
- Is there a responsible person?
- Does that person have the authority to correct the hazard?
- Does that person possess the skills, knowledge and ability to correct the hazard?
- Does the person have adequate resources?
- Is that person motivated to correct the hazard?

Guidelines for hazard identification

Encourage open communication by all employees with surveyors.

Cover every part of the worksite with inspections at regular intervals (depending on the size and nature of the hazards).

Train in-house inspectors to recognize hazards.

Track identified hazards to their correction.

NOTE: Tracking promotes awareness of the status of long-term correction items, provides a record of what occurred if it reappears at a later date, provides a record for the employee who reported the hazard and provides information on interim protective measures.

Involve safety and health professionals in your plans for purchasing or leasing any facility.

Involve safety and health professionals in your plans for installing new equipment.

Research the hazards associated with new materials before introducing them into your work processes.

EXAMPLE: *Obtain and study the Material Safety Data Sheet for all materials containing hazardous ingredients.*

Replace hazardous materials with less hazardous ones, if possible.

After employees have become familiar with the procedures in new processes, perform routine hazard analysis to identify any “hidden” hazards.

Repeat the process hazard analysis at regular intervals to ensure that current processes are analyzed.

ATTRIBUTES **of** EXCELLENCE

Expert Surveys

- | | | | |
|----|--|------------------------------|-----------------------------|
| 1. | The surveys are completed at appropriate intervals, with consideration to more frequent surveys in more hazardous, complex and highly changing environments. | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| 2. | The surveys are performed by individuals competent in hazard identification and control, especially with hazards that are present at the worksite. | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| 3. | The survey drives immediate corrective action on items found. | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| 4. | The survey results in optimum controls for hazards found. | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| 5. | The survey results in updated hazard inventories. | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

Change Analysis

- | | | | |
|-----|--|------------------------------|-----------------------------|
| 6. | Operational changes in space, processes, materials or equipment at the facility are planned. | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| 7. | Planned operational changes are known to responsible management and affected workers during the planning process. | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| 8. | A comprehensive hazard review process exists and is used for all operational changes. | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| 9. | The comprehensive hazard review process involves competent, qualified specialists appropriate to the hazards anticipated and the operational changes being planned. | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| 10. | Members of the affected workforce actively participate in the comprehensive hazard review process | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| 11. | The comprehensive hazard review process results in recommendation for enhancement or improvement in safety and health elements of the planned operational change which are accepted and implemented prior to operational start-up. | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

ATTRIBUTES **of** EXCELLENCE

Routine Hazard Analysis

12. Yes No Members of management and of the workforce are aware that hazards can develop within existing job, processes and/or phases of activity.
13. Yes No One or more hazard analysis systems designed to address routine job, process, or phase hazards is in place at the facility.
14. Yes No All jobs, processes, or phases of activity are analyzed using the appropriate hazard analysis system.
15. Yes No All jobs, processes, or phases of activity are analyzed whenever there is a change, when a loss incident occurs, or on a schedule of no more than three (3) years.
16. Yes No All hazard analyses identify corrective or preventive action to be taken to reduce or eliminate the risk of injury or loss, where applicable.
17. Yes No All corrective or preventive actions identified by the hazard analysis process have been implemented.
18. Yes No Upon implementation of the corrective or preventive actions identified by the hazard analysis process, the written hazard analysis is revised to reflect those actions.
19. Yes No All members of the workforce have been trained on the use of appropriate hazard analysis systems.
20. Yes No A representative sample of employees is involved in the analysis of the job, process, or phase of activity which applies to their assigned work.
21. Yes No All members of the workforce have ready access to, and can explain the key elements of, the hazards analysis which applies to their work.

HAZARD IDENTIFICATION

Inspection

- 22. Inspections of the workplace are conducted in all work areas to identify new, reoccurring, or previously missed safety or health hazards and/or failures in hazard control systems. Yes No
- 23. Inspections are conducted routinely at an interval determined necessary based on previous findings or industry experience (at least quarterly at fixed work sites, weekly at rapidly changing sites such as construction, as frequent as daily or at each use where necessary.) Yes No
- 24. Personnel at all levels of the organization are routinely involved in safety and health inspections. Yes No
- 25. All personnel involved in inspections have been trained in the inspection process and in hazard identification. Yes No
- 26. Standards exist which outline minimum acceptable levels of safety and health which are consistent with federal OSHA or state safety and health requirements, where they exist. Yes No
- 27. Standards cover all work and workplaces at the facility and are readily available to all members of the workforce. Yes No
- 28. All personnel involved in inspections have been trained on the work place safety and health standards and demonstrate competence in the standards and their application to the worksite. Yes No
- 29. All inspections result in a written report of hazard findings, where applicable. Yes No
- 30. All written reports of inspections are retained for a period required by law or sufficient to show a clear pattern of inspections. Yes No
- 31. All hazard findings are corrected as soon as practically possible and are not repeated on subsequent inspections. Yes No
- 32. Statistical summaries of all routine inspections are prepared, charted, and distributed to management and the workforce so as to show status and progress at hazard elimination. Yes No

WorksiteScore

Total number of "Yes" responses:

Total number of responses:

Divide number of "Yes" responses by total number of responses

Multiply by 100 = your score

÷

32

=

x100 =

 %

Hazard Reporting System

OBJECTIVE: *So that*

employee insight and

experience in safety and

health protection may be

utilized and employee

concerns may be

addressed, provide a

reliable system for

employees, without fear

of reprisal, to notify

management personnel

about conditions that

appear hazardous and to

receive timely and

appropriate responses;

and encourage

employees to use

the system.

Characteristics of a hazard reporting system

A hazard reporting system should encourage employees to report concerns about safety and health conditions.

As outlined in Chapter 1, the organization should have a safety and health policy which is communicated to employees and is accessible by them. The organization should also have a written policy that provides for hazard reporting by employees.

A written policy for hazard reporting reaffirms your commitment to the organization's overall safety and health policy. It allows for the policy to be distributed and communicated consistently to all employees, and affirms your intention to protect employees from harassment or reprisal.



EMPLOYEE REPORTING OF HAZARDS EXAMPLE POLICY STATEMENT

Every employee is expected to watch for and report hazards and potential hazards to their supervisor and/or employee safety and health committee.

You may report potentially hazardous conditions or practices in person to your supervisor, or by submitting a written report through the (name of written hazard reporting system). Make your report immediately or as soon as possible.

Your participation is essential to keep this workplace safe and healthful!

Once your organization has a policy for hazard reporting, you must make sure that all employees know the policy and understand it.

Provides timely and appropriate responses to the reporting employee(s). Employees may not take your hazard reporting policy seriously if they cannot see reasonable results within a reasonable time (or receive an adequate explanation).

As a part of your hazard reporting system, you should give employees a preliminary response about a reported hazard when extra time is required to assess the hazard. When complete correction of the hazard requires interim protection until ordered parts or materials are available, or until work can be completed, the reporting system should provide for regular updates on the status of the corrective action.

Ensures timely and appropriate action where valid concerns exist.

The organization's response to reported hazards must be timely and must eliminate the concern of the employee(s) reporting the hazard. If it is determined that corrective action is not necessary, then this judgment and its explanation must also be communicated to the reporting employee(s). Supervisors and managers should also take the time to express their concern and gratitude to the employee(s) caring enough to report a potential hazard, even if that hazard turns out to be a non-hazard.

If a reported condition or practice cannot immediately be judged hazardous, then conduct further investigation as needed.

REPORTING

Tracks hazard corrections

In spite of comprehensive preventive measures and controls, hazards sometimes occur. Once hazards are identified and reported, they must be “tracked” or documented until they are corrected.

Valid hazards reported should be tracked to their final correction.

Tracking ensures that corrective action was implemented and completed. This includes interim protection and final correction. Tracking also helps to keep the reporting employee(s) informed about the organization’s response to the report.

For hazards that can be quickly corrected, a record of the correction will help in determining where the safety and health program can be improved, should the same hazard reappear.

EXAMPLE: Different management measures may be needed for hazards that do not remain corrected, compared to those that do not receive attention/correction. For hazards that cannot be quickly corrected, a record is required so that final correction is not forgotten.

To be effective, the hazard reporting system must reassure employees that reporting a hazard will not lead to official or unofficial harassment or reprisal. The policy for employee reporting of hazards should make this clear.

Methods of reporting

Oral reports – All employees should be able to report potential hazards to their supervisors (or other designated individuals). Oral reports should be combined with other methods of hazard reporting. Used alone, this method does not allow for tracking the hazard correction. It also does not enable the organization to identify trends and patterns and may not lead to hazard correction if the supervisor or other responsible party does not follow through with the report.

HAZARD REPORTING SYSTEM

Suggestion programs – This is the most frequently used written method of hazard reporting. It is a positive approach that not only provides for hazard reporting, but also encourages the reporting employee(s) to become involved in correcting the hazard. For a suggestion program to be effective, the individual(s) responsible must collect and read the suggestions as soon as possible; this will ensure timely and appropriate action. If a suggestion program is the only method used for reporting hazards (or is the only written method), employees must be encouraged to report all types of hazards, not just “improvement ideas.”

Hazard cards – This method allows employees to write down unsafe conditions or practices on special cards, which are then submitted to the safety department or other authority in the organization.

Work orders – This method can utilize an existing maintenance work orders system to log and track unsafe conditions. The hazard is noted on a work order that is given to the appropriate maintenance authority. In some organizations, every employee is given the authority to fill out such work orders; in others, supervisory sign-off is required. Work orders are effective if a special “high priority” code is assigned to maintenance requests dealing with safety and health hazards. Work orders identified by this code receive a higher priority than other work orders, so that potential hazards receive a timely response.

The work order can also serve as documentation of the hazard follow-up and correction.

Some of the methods described involve the use of written forms. The best written method for hazard reporting uses forms that you design specifically for employee reporting of hazards at your organization. This method can allow for anonymity in both the design of the forms and in the procedures for submission. For example, forms can be designed for anonymous reporting of hazards, responses to anonymous reports can be through posting of the response in conspicuous areas. A combination of methods is most effective.

The need for interim protection

Interim protection means taking whatever steps may be feasible to temporarily eliminate or control a hazard until a more permanent correction can be made. After a hazard is recognized and reported, the preferred corrective measures cannot always be accomplished immediately. For example, complete correction of the hazard may be delayed until

ordered parts or materials are available, or until work initiated can be completed. In such cases, it is your responsibility to provide interim protection to your employees.

EXAMPLE: Taping down cords that pose a tripping hazard; shutting down air operation temporarily.

The importance of interim protection cannot be overemphasized: **There is no way to predict when a hazard will cause serious harm, and there is no justification for continuing to expose employees to risk unnecessarily.**

Guidelines for establishing a hazard reporting system

- Develop a policy for hazard reporting.
- Make sure that all employees know about the policy for reporting hazards and that they understand that policy.
- The policy should be printed, distributed to all employees, posted and discussed during regular safety meetings.
- Demonstrate that the policy for reporting hazards is real: Involve employees in creating the policy, share and discuss the policy with all employees, and follow through with the policy.
- Protect reporting employees from harassment or reprisal.
- Use the information gained through the hazard reporting system to improve the overall safety and health program.

NOTE: It is better to have some non-hazards reported than to risk even one real hazard that was not reported because it was believed that the organization would not respond.

ATTRIBUTES **of** EXCELLENCE

1. A system for employee hazard reporting is in place and is known to all employees. Yes No
2. The system allows for the reporting of physical and behavioral hazards. Yes No
3. Supervisors and managers actively encourage use of the system and employees feel comfortable using the system in all situations. Yes No
4. The system provides for self-correction through empowerment. Yes No
5. The system involves employees in correction planning as appropriate. Yes No
6. The system provides for rapid and regular feedback to employees on the status of evaluation and correction. Yes No
7. Employees are consistently reinforced for using the system. Yes No
8. Appropriate corrective action is taken promptly on all confirmed hazards. Yes No
9. Interim corrective action is taken immediately on all confirmed hazards where delay in final correction will put employees or others at risk. Yes No
10. The system provides for data collection and display as a means to measure the success of the system in resolving identified hazards. Yes No

WorksiteScore

Total number of "Yes" responses:

÷

Total number of responses:

=

Divide number of "Yes" responses by total number of responses

x100 =

Multiply by 100 = your score

 %

Accident-Incident Investigation & Analysis

OBJECTIVE: *Provide for*

investigation of

accidents and “near

misses,” so that their

causes and means for

their prevention are

identified. Analyze

injury and illness trends

over time, so that

patterns with common

causes can be identified

and prevented.

The need for investigation and analysis

Even after designing and implementing systems for hazard identification and reporting organizations will still encounter hazards at the workplace. These hazards might have been missed as the identification and reporting systems were developed or, the measures taken may not have been enough to prevent or control the hazards over a period of time. Regardless of why they happened, you can investigate these continuing hazards and determine how they happened so the organization can correct them and improve their control.

Investigation and analysis is another tool useful for discovering every contributing factor to an accident or incident. In other words, the goal is to identify the root causes.

Who investigates?

The actual investigator must have the proper training and resources to be successful. Many companies use trained employees, as well as a safety supervisor. The trend is to use a safety team having special accident/incident investigation training.

Fatalities

Lost Workdays

OSHA Recordable

First aid

Near Miss

Root cause
Unsafe Behavior

The only
difference
is luck





ANALYSIS

What should be investigated?

All accidents/incidents should be investigated to determine the contributing causes and actions needed to prevent future occurrences. Mishaps or “near misses” describe incidents where no property was damaged and no injuries sustained, but easily could have occurred should also be investigated.

What questions should be answered?

The purpose of accident investigations is to determine the root causes so that changes can be made in the management system to avoid recurrences. Assigning blame or pointing fingers, especially at the injured party should be avoided. A systematic approach should be used which involves conducting fact-finding interviews which answer the following questions:

- What happened? Describe the accident or incident.
- When did it happen? Include the date and the time of day.
- Who was involved in the accident or incident?
- Where did the accident incident take place? Include rooms, work stations, etc.
- How did it happen? Describe the work being done at the time of the accident or incident. Include the condition of the work environment at the time.
- Why did the accident or incident occur? The investigation should provide the answer to this question in the form of root causes and contributing factors.

Facts should be distinguished from opinion, and both should be presented carefully and clearly.

Listen for catch-phrases, such as “The employee did not plan the job properly,” or “The employee was not being careful.” Statements like these may tend to lay blame on the worker, but do not support all possible causes, preventions

and controls.

If the same type of incident repeats itself, the hazard control system may be inadequate or need revision. Trends or patterns can also identify training or retraining needs. After discovering a pattern or root cause, you must document the cause and inform management and employees of the item(s) needing correction and the time required for completion.

Look for patterns, types of incidents, the need for training, the need for engineering controls or PPE and other clues.

Where to look

Trends or patterns can be analyzed by reviewing the following items:

- OSHA 200 Log
- OK 200 Log (public sector)
- Inspection records
- Employee hazard reporting records
- First aid logs
- Interviews from employees or first aid personnel

These items should not be the final analysis of records. Any documents that may prove helpful should be reviewed. Documents reviewed must provide data covering a time frame sufficient to allow patterns to emerge.

EXAMPLE: A small worksite with few employees may require a review of 3 to 5 years to have enough data to be statistically meaningful.

ATTRIBUTES **of** EXCELLENCE

Incident Investigation

1. Workplace policy requires the reporting of all actual and “near miss” accidents. Yes No
2. All members of the workforce are familiar with the policy on accident/incident reporting. Yes No
3. All accidents and incidents are reported as required by policy. Yes No
4. Workplace policy requires a thorough investigation of all accidents and incidents. Yes No
5. All accidents and incidents are investigated as required by policy. Yes No
6. All investigations are conducted by personnel trained in accident/incident investigation techniques. Yes No
7. All investigations include input from impacted parties and witnesses where possible. Yes No
8. All investigations determine “root causes.” Yes No
9. Recommendations designed to adequately address root causes are made as a result of all investigations and result in prompt corrective action. Yes No
10. Completed investigation reports are routed to appropriate levels of management and knowledgeable staff for review and are provided promptly to government officials, as required, in accordance with law and applicable standards. Yes No

ATTRIBUTES **of** EXCELLENCE

Trend Analysis

11. Yes No A system exists which tracks trends in safety and health at the facility.
12. Yes No The system addresses trailing indicators, including accidents, occupational injuries and illnesses, hazards identified and complaints from employees and others.
13. Yes No The system addresses leading indicators of safety and health effectiveness, including employee attitudes and employee behaviors.
14. Yes No All personnel at the facility are aware of the need to provide incident and activity information to the system, and do so systematically, accurately and consistently.
15. Yes No An individual, or group, is assigned responsibility for compiling and analyzing records for safety and health trends.
16. Yes No Trend data consistently provided to all facility personnel.
17. Yes No All personnel are fully aware of safety and health trends, causes, and means of prevention.
18. Yes No Trend data is utilized to drive improvement and prevention activities.
19. Yes No Employees are active participants in the determination of collection methods, collection, analysis and intervention selection.

WorksiteScore

Total number of "Yes" responses:

÷

Total number of responses:

=

Divide number of "Yes" responses by total number of responses

x100 =

Multiply by 100 = your score

 %

Timely Hazard Control & Facility/Equipment Upkeep

OBJECTIVE: *Provide*

for investigation of

accidents and “near

misses”, so that their

causes and means for

their prevention are

identified. Analyze

injury and illness

trends over time, so that

patterns with common

causes can be identified

and prevented.

Sources for updating hazard information

The most frequent sources for updating hazard information are routine general inspections, employee reports of hazards and incident investigations. Other sources include the ongoing job hazard analyses, process and phase hazard analyses and periodic comprehensive hazard surveys.

Methods of preventing or controlling hazards

Potential or existing hazards may be prevented or controlled using several methods. These methods may include:

- Engineering controls
- Preventive maintenance program
- Hazard correction tracking systems
- Administrative controls
- Safe work practices
- Personal protective equipment (PPE)

Engineering controls

The work environment and the job itself should be designed to eliminate or reduce employee exposure to hazards.

General principles – Engineering controls can be very simple in some cases. They are based on the following general principles: If feasible, design the facility, equipment or process to remove the hazard and/or introduce a non-hazardous or less hazardous substitute. If removal or substitution are not feasible, enclose the hazard to prevent exposure in normal operations; and where complete enclosure is not feasible, establish barriers or local ventilation to reduce exposure to the hazard in normal operations.



CONTROL

Elimination of hazards by design - Designing facilities, equipment, or processes so that the hazard is no longer even potentially present obviously offers the best worker protection.

Some examples are:

- Redesigning, changing, or substituting equipment to remove the source of excessive temperatures, noise, or pressure;
- Redesigning a process to use less toxic chemicals;
- Redesigning a work-station to relieve physical stress and remove ergonomic hazards; or,
- Designing general ventilation with sufficient fresh outdoor air to improve indoor air quality and generally to provide a safe, healthful atmosphere.

Enclosure of hazards – When you cannot remove a hazard and cannot replace it with a less hazardous alternative, the next best control is enclosure. Enclosing a hazard means to prevent the exposure to workers during normal operations. Potential exposure may occur during maintenance operations or if the enclosure system breaks down. In this case, additional controls such as work practices or personal protective equipment may be necessary to control exposure.

Some examples of enclosure designs are:

- Complete enclosure of moving parts of machinery; and
- Complete containment of noise, heat or pressure-producing processes with materials especially designed for those purposes.

Barriers or local ventilation – When the potential hazard cannot be removed, replaced, or enclosed, the next best approach is barrier to exposure, or in the case of air contaminants, local exhaust ventilation to remove the contaminant from the workplace. This particular control should be used in conjunction with other types of controls, such as safe work practices designed specifically for an existing hazard or condition.

Examples include:

- Machine guarding, including electronic barriers.
- Ventilation hoods in laboratory work.
- Isolation of a process, in an area away from workers except maintenance work.

Safe work practices

Many of your organization's general workplace policies and procedures have a bearing on safety and health. It is appropriate to think of these as hazard controls.

General workplace rules apply to everyone. However, specific work practices may be needed to protect employees in a variety of situations. By following established safe work practices for accomplishing a task safely (and using personal protective equipment in many cases), your employees can further reduce their exposure to hazards.

Workplace rules - An important part of your hazard prevention and control program will be your workplace rules. These rules play a major part in identifying acceptable and unacceptable behavior.

Sample categories of workplace rules include the following:

- Procedures regarding the use of equipment or materials
- Safe acts or behaviors
- Lockout/Tagout procedures
- Personal Protective Equipment procedures
- Good housekeeping practices

GENERAL WORKPLACE RULES

Report unsafe conditions to your immediate supervisor.

Promptly report all injuries to your immediate supervisor.

Dress properly. Wear appropriate work clothes, gloves and shoes or boots. Loose clothing and jewelry shall not be worn.

Never operate any machine unless all guards and safety devices are in place and in proper operating condition.

Keep all equipment in safe working condition. Never use defective tools or equipment. Report any defective tools or equipment to immediate supervisor.

- Properly care for and be responsible for all personal protective equipment.
- Maintenance, jam clearing and adjustments are made only when equipment is locked out.
- Do not leave materials in aisles, walkways, stairways, roads or other points of egress.
- Practice good housekeeping at all times.

TIMELY HAZARD CONTROL & FACILITY/EQUIPMENT UPKEEP

Safety and health rules are most effective when they are written, posted and discussed with all affected employees. When employees play a role in formulating the rules, they are more likely to understand and follow them.

Safe work practices are often very general in their applicability to the workplace.

EXAMPLE: Removal of tripping, blocking and slipping hazards; removal of accumulated toxic dust on surfaces; wetting surfaces to keep toxic dust out of the air.

They may also apply to specific jobs or tasks in the workplace and involve specific procedures for accomplishing a particular job or task. Specific procedures are an important aspect of quality management and are useful in managing worker safety and health as well. Safe work practices are generally derived from the job hazard analysis. From a detailed job hazard analysis, you may determine that safe work practices must be changed or that a training program must be conducted.

EXAMPLE: Since a large proportion of serious injuries occur while workers are performing non-routine tasks, a concentrated effort must be made to plan and develop safe work procedures for such tasks.

Remember that safe work practices should be used in conjunction with, not as a substitute for, more effective or reliable engineering controls.

Training

It is essential that employees understand why safe work practices are needed. They must understand that, for an accident or injury to occur, two things must be present: a hazard and an employee. Remove the hazard and there will be no injury; train the employee to follow proper and safe work practices, and those safe work practices can help the employee to avoid harm.

The employer has a responsibility to ensure that worker training has achieved its objectives: **that workers understand the hazards and know how to protect themselves.**

Positive reinforcement – Positive reinforcement is one method that can be used to verify successful employee training. This is accomplished by acknowledging employees who follow the established safe work procedures. Be aware that award programs with prizes for hours worked without injury can put pressure on employees not to report injuries or illnesses, reducing the effectiveness of the hazard reporting system.

Enforcement – Safe work practices must be made a condition of employment. In addition, a discipline system must be established and implemented fairly and consistently. Each violation of workplace rules must be linked to a procedure for corrective action.

Your goals are (1) to take the corrective action appropriate to the seriousness of the violations (2) to give employees the opportunity to correct their own behavior and (3) to make the disciplinary system workable and useful.

An enforcement system should not exist mainly to punish employees. Instead, its purpose should be to control the work environment so that employees are protected and accidents/incidents are prevented. Enforcement must be based on letting employees know what is expected of them regarding workplace safety and health; it lets employees know how they are expected to work in relation to the goals of the organization's safety and health program. (You may want to consider including employees in the development of the enforcement system.)

Personal protective equipment (PPE)

You may be unable to completely engineer-out exposures to hazards. Or, safe work practices may not provide adequate protection for employees. Another method of control is the use of personal protective equipment (PPE). The term covers such items as face shields, steel-toed shoes and boots, safety glasses and goggles, hard hats, leather aprons and belly guards, metal-mesh gloves, forearm guards, respirators and protective clothing.

Legal requirements –When using PPE, you must make sure that you comply with requirements addressing the use of specific items.

TIMELY HAZARD CONTROL & FACILITY/EQUIPMENT UPKEEP

Drawbacks -The limitations of work practices in controlling hazards also apply to personal protective equipment. Employees need training in why PPE is necessary and how to use and maintain it. A significant drawback is that some PPE is uncomfortable and puts additional stress on employees. Such equipment may make its use unpleasant or make it difficult for employees to work safely. Employees should also be trained on the limitations of PPE.

Costs - Employers are required to provide personal protective equipment at no cost to the employee.

Administrative controls

Administrative controls include lengthened rest breaks, additional relief workers, exercise breaks to vary body motions and rotation of workers through different jobs to reduce or “even out” exposure to hazards or to allow employees to work part of the day without burdensome personal protective equipment. Administrative controls are normally used in conjunction with other controls that more directly prevent or control exposure to hazards.

Preventive maintenance program

Purposes - The purpose of preventive maintenance is to get the work done before repair or replacement is required. Good preventive maintenance plays a major role in ensuring that hazard controls continue to function effectively. Preventive maintenance also keeps new hazards from arising due to equipment malfunction.

Scheduling - To realize the benefits of preventive maintenance, the organization must have one or more individuals who are knowledgeable regarding the equipment and are able to schedule the maintenance required to keep the equipment or process operating appropriately.

Needs survey - Your preventive maintenance program should include a workplace survey to identify all equipment or processes which may require routine maintenance. This information should be placed on a list and reviewed periodically to ensure that the list is accurate.

CHAPTER 10

Timetable - You will need to establish a timetable for the maintenance necessary for each item on the list resulting from your maintenance needs survey. Maintenance should be performed at least as often as recommended by the manufacturer. Review the maintenance timetable periodically to ensure that all timetables are being met.

Accessibility - It is essential that your preventive maintenance schedule be accessible. This will assist in the scheduling of required maintenance. Posted or computerized schedules are two examples of options for making the maintenance schedule known.

Documentation - Records must be maintained for all completed maintenance. This can be achieved using a computer system or by simply adding a date and initials to the posted work schedule. Documentation will assist you in keeping up with the required maintenance and can also serve as a way of identifying and rewarding employees who have been instrumental in preventing costly repairs and accidents.

ATTRIBUTES **of** EXCELLENCE

Hazard Control

1. Hazards controls are in place at the facility. Yes No
2. Hazard controls are selected in appropriate priority order, giving preference to engineering controls, safe work procedures, administrative controls and personal protective equipment (in that order). Yes No
3. Once identified, hazards are promptly eliminated or controlled. Yes No
4. Employees participate in developing and implementing methods for the elimination or control of hazards in their work areas. Yes No
5. Employees are fully trained in the use of controls and ways to protect themselves in their work area and utilize those controls. Yes No

Facility/Equipment Maintenance

6. A preventive maintenance program is in-place at the facility. Yes No
7. Manufacturers' or builders' routine maintenance recommendations have been obtained and are utilized for all applicable facilities, equipment, machinery, tools, and/or materials. Yes No
8. The preventive maintenance system ensures that maintenance for all operations in all circumstances. Yes No

WorksiteScore

Total number of "Yes" responses:

÷

Total number of responses:

=

Divide number of "Yes" responses by total number of responses

x100 =

Multiply by 100 = your score

 %

Emergency Planning

OBJECTIVE: *Plan and prepare for emergencies and conduct training and drills as needed, so that the response of all parties to emergencies will be “Second Nature”.*

The nature of emergencies

During emergencies, hazards appear that normally are not found in the workplace. These hazards may be the result of natural causes such as earthquakes, tornadoes, hurricanes, floods, or ice storms. Emergencies may also occur within your own systems due to unforeseen combinations of events or the failure of one or more hazard control systems.

Emergencies are not part of the expected daily routine, but they may happen any day. If they do, their cost in terms of dollar losses and human suffering can be high. Organizations must become aware of the emergency situations possible and must plan the best way to control or prevent the hazard(s) such situations present.

A system for responding to workplace emergencies will complement the organization’s hazard controls.

Survey of possible emergency situations

You should begin your emergency preparation with a survey of all possible emergency situations that could occur at your workplace. You may want to start by listing the occurrences within the categories listed below:

Natural disaster - Review the natural disasters that may occur in your geographical area. (You may also want to consider the chances of other types of natural disasters which may not be common to your area.)

Human errors or disasters beyond the controls of your workday - Consider the environment around your workplace:

- Is the site located near an airport or on an airport’s landing/takeoff pattern?
- Is a railroad track nearby where trains carry products other than those that you ship or receive? If so, are the tracks near enough that an accident involving the release of toxic materials could affect your workplace?



PLANNING

- Are chemical or other potentially dangerous sites in your neighborhood that could leave internal emergencies which might affect your workday?
- Have there been terrorist activities against other facilities nearby, those belonging to your organization or facilities having similar processes or products?

Emergency planning

Once you have determined the possible emergencies that may occur at your location, you must develop a plan of action to reduce their potential impact on your employees' safety and health.

Plan for the first aid or medical response needed for each emergency, including the source of each response (including in-house and outside responders).

If you are relying on outside medical or emergency response providers, communicate with them and plan together for emergencies.

Employee information and training

If your emergency plans require employee participation, you must ensure that all employees understand what is expected of them.

All employees should be drilled on the emergencies most likely to occur. Regular drills will help to develop the necessary responses employees will need to protect themselves and others. A schedule should also be developed indicating the frequency and types of drills that will occur at your workplace.

Examples of training topics include PPE, hazardous waste, confined space entry, fire prevention and control and bloodborne pathogens.

ATTRIBUTES **of** EXCELLENCE

Emergency plan

1. Yes No All potential emergency situations which may impact the facility are identified.
2. Yes No A facility plan to deal with all potential emergencies has been prepared in writing.
3. Yes No The plan incorporates all elements required by law, regulations and local code (including the requirements of **29CFR 1910.38, CFR1910.119, 29CFR 1910.120 and RCRA**, where applicable).
4. Yes No The plan is written to complement and support the emergency response plans of the community and adjacent facilities.
5. Yes No The plan is current.
6. Yes No The plan is known to all personnel at the facility who can explain their role under the plan and can respond correctly under exercise or drill situations.
7. Yes No The plan is known to community emergency response commanders.
8. Yes No The plan is tested regularly with drills and exercises.
9. Yes No Community emergency responders are involved, where appropriate, in the facility drills and exercises.
10. Yes No The plan is implemented immediately when an emergency at or impacting the facility is known.
11. Yes No The plan is effective at limiting the impact of the emergency on the facility and the workforce.

EMERGENCY PLANNING

Emergency Equipment

- 12. Emergency communications systems are installed at the facility. Yes No
- 13. The communication systems are redundant (such as alarm boxes, emergency telephones, PA systems, portable radios). Yes No
- 14. The communication systems are operational. Yes No
- 15. The communication systems are tested at regular intervals (at least monthly). Yes No
- 16. All personnel at the facility are trained in the use of the communication systems and can demonstrate their proper use. Yes No
- 17. Fire exits, evacuation maps and other emergency directions are installed at the facility. Yes No
- 18. Emergency directions are available, correct and accurate in all spaces, corridors and points of potential confusion. Yes No
- 19. Personnel are aware of the emergency directions and can accurately describe the action they are to take in an emergency based on the directions available to them in their work area. Yes No
- 20. Emergency equipment appropriate to the facility (including sprinkler systems, fire extinguishers, first aid kits, fire blankets, safety showers and eye washes, emergency respirators, protective clothing, spill control and clean-up material, chemical release computer modeling, etc.) is installed or available. Yes No
- 21. Emergency equipment is distributed in sufficient quantity to cover anticipated hazards and risks, is operational, and is tested at regular intervals (at least monthly). Yes No
- 22. All personnel at the facility are trained in the use of emergency equipment available to them and can demonstrate the proper use of the equipment. Yes No

WorksiteScore

Total number of "Yes" responses:

Total number of responses:

Divide number of "Yes" responses by total number of responses

Multiply by 100 = your score

÷

=

x100 =

%

Medical Program

OBJECTIVE: *Establish a medical program which includes availability of first aid on-site and of physician and emergency medical care nearby, so that harm will be minimized if any injury or illness does occur. The health provider also conducts periodic visits and walkthroughs of the facility to maintain familiarity with the jobs being performed and has participated in a safety analysis of those jobs.*

The need for a medical program

Through your safety and health program, you are identifying hazards and involving employees for the purposes of preventing injuries and illnesses. However, we must accept the reality that despite our best planning and prevention, injuries and illness can occur. Therefore, you must always be prepared to deal with medical emergencies at your worksite. In fact, this is required by OSHA standards (29 CFR 1910.151(b)) for worksites that are not close to medical facilities. OSHA has interpreted this rule to mean within a five (5) minute response time. First aid and CPR assistance should be available on every shift at your worksite.

Medical programs provide occupational health care, both onsite and nearby. A medical program is another name for the system that employers put in place to assure occupational health expertise within the overall safety and health program. Having a medical program does not necessarily mean that you must hire a doctor to work in your organization. There are many ways to find and use occupational health expertise.

A medical program includes activities that cover the safety and health hazards in your workplace and that will help you to formulate a plan for prevention or control. It is a management system in the same way that the action you take to promote safety is a management system.

Scope and benefits of medical programs

Medical programs consist of everything from basic first aid and CPR response to sophisticated approaches for the diagnosis and resolution of ergonomic problems. The nature and extent of your medical program will depend on a number of factors. (If use of nearby medical facilities appears to be the best arrangement, be sure to meet with representatives of that facility to discuss your medical needs.)



MEDICAL

An effective medical program will help reduce all types of safety and health hazards and the resulting injuries and illnesses. The positive results from such a program can be measured by a decrease in lost workdays and worker's compensation costs. You can also expect the medical program to help increase worker productivity and morale.

Who should manage the medical program?

Whatever medical program you decide to use, it is important to use a medical specialist with occupational health/medical training. Not every nurse or doctor is trained to understand the relationships among the workplace, the work and certain medical symptoms. The size and complexity of your medical program will depend on the size of your worksite, its location in relation to health care provider organizations, and the nature of the hazards that exist at your worksite.

The medical program works best when managed by occupational health professionals. This does not mean that you have to employ an occupational health professional as a full time employee. You cannot expect to get all the information and service from one individual or specialist. Therefore, you may want to develop a network of professionals (occupational medicine physicians, nurses, paramedics and/or physical therapists).

What services are required from the medical program?

Examine your organization's special characteristics in developing the medical program that is right for the organization. These special characteristics may include:

- The actual processes in which employees are engaged;
- The type of materials handled by employees;

- The type of facilities where employees are working;
- The number of employees at each site under consideration;
- The characteristics of the workforce; and,
- The location of each operation and its distance from health care facilities.

While looking at the characteristics of your employees and workplace, you should ask yourself the following questions. Your answers will give you a better understanding or idea of the medical program services you need.

Are hazards in the processes, materials, or facilities that make it likely that employees will get sick or hurt or will suffer abnormal health effects from their work?

EXAMPLE: Repetitive jobs, chemical exposure, work station/ work flow design.

- Are there so few employees that onsite occupational health resources are less practical than off-site contract services?
- Are there so many employees that time and money will be saved by installing onsite resources?
- Do the workers have unique characteristics which make them more vulnerable to illness or injury or less likely to understand the safety and health hazards of the worksite?

EXAMPLE: Are some employees not physically able to use PPE? Are any employees sensitive to exposure? Are any employees vulnerable due to literacy or language barriers?

NOTE: Under the Americans with Disabilities Act (ADA), employers may require employees to submit to medical examination only when justified by business necessity. It is OSHA's judgement that a health and safety concern qualifies as a business necessity. The results of any medical examinations are subject to certain disclosure and record retention requirements (29CFR1910.120), but are also subject to confidentiality requirements of the ADA.

The ADA's employment-related provisions are enforced primarily by the U.S. Equal Employment Opportunity Commission.

- Is there anything about the workplace that makes it important to have occupational health assistance that is closer or more rapidly obtainable?

MEDICAL PROGRAM

Guidelines for implementing the range of medical program functions

Medical program activities are of three basic types:

- Preventing hazards that cause illnesses and injuries;
- Recognizing and treating work-related illnesses and injuries; and,
- Limiting the severity of work-related illnesses and injuries.

Preventing hazards

Make sure the safety and health policy shows that the organization is as concerned about its employees' health as it is about their safety.

Use the Occupational Health Professional in developing and prescribing health training and other preventive activities, including the various measures required by OSHA's bloodborne pathogens standard.

NOTE: It is your responsibility to determine if you have employees who fall within the scope of the bloodborne pathogens standard and to make arrangements for compliance for these employees. Staff nurses, physicians and emergency response personnel are covered by this standard even where no other employees appear at risk of occupational exposure to infectious diseases.

Provide professional occupational health expertise as a resource to your safety and health committee.

Include your medical program in annual self-evaluations.

Recognizing and treating

Use Occupational Health Professionals to help you decide the basis on which existing or potential hazards are treated at your workplace – when you may need to conduct baseline and periodic testing of employees and new hires for evidence of exposure.

NOTE: This is called "Health Surveillance" and is required by some OSHA standards for specific types of exposure.

Use Occupational Health Professionals to do the testing needed for health surveillance.

Make sure records are kept of employee visits to first aid stations, the nurse's office, contract clinic or hospital.

NOTE: Have an Occupational Health Professional review the symptoms reported and the diagnoses to see if patterns appear which indicate an occupational health problem.

Provide first-aid and CPR assistance through properly trained employees on every shift. Make sure these employees keep up their certifications and that they receive adequate training in the hazards specific to the worksite.

NOTE: The Occupational Exposure to Bloodborne Pathogens standard (29CFR1910.1030) outlines specific training requirements for employees expected to render first aid at work. It is essential that employees understand the hazards from bloodborne communicable diseases, including hepatitis B and AIDS and how to protect themselves.

Make sure that the Occupational Health Professionals have current credentials and have had recent occupational health continuing education, and understand the hazards of your worksite.

NOTE: These standards will help ensure their ability to recognize early symptoms of occupational health problems and begin prompt and appropriate treatment to prevent complications.

Make sure that standardized procedures (protocols) are issued throughout your occupational health delivery system, especially if you are using more than one contractor for medical services.

Make sure your record keeping system effectively ensures the confidentiality of individual employee medical records.

Limiting Severity

Coordinate the emergency response duties of all individuals at the worksite as well as any emergency response organizations off the worksite.

EXAMPLE: Consider the fire department, any contractual organization, or a nearby hospital. Everyone must know exactly what to do and what to expect from others.

Maintain contact through your Occupational Health Professional with any employee who is off work due to an occupational illness or injury. Keep in touch with the physician providing treatment and care to ensure that the treatment is appropriate and that the employee is responding as expected.

Use a registered nurse or physician to help advise an employee who is off work for an extended period about worker's compensation rights and benefits, as well as ongoing care.

Consult your physician or registered nurse for help with the development of a "modified duty position," to ensure that the employee can perform the work and benefit from feeling productive again.

Develop and deliver health care in accordance with federal and state regulations.

ATTRIBUTES **of** EXCELLENCE

Occupational Health Provider

1. Yes No The employer has an existing relationship with a health provider to deliver health services as requested by the employer.
2. Yes No The health provider is trained, experienced and/or certified in the identification, treatment and rehabilitation of occupational injuries and illnesses.
3. Yes No The health provider is familiar with applicable OSHA regulations and record-keeping requirements.
4. Yes No The health provider conducts periodic visits and walk-throughs of the facility to maintain familiarity with the jobs being performed and has participated in a safety analysis of those jobs.
5. Yes No The health provider is available to conduct training and is accessible to employees to discuss health concerns.

Emergency Care

6. Yes No The facility has a plan for providing emergency medical care to employees and others present on the site.
7. Yes No The plan provides for competent emergency medical care within three (3) minutes and which is available on all shifts of work.
8. Yes No Competent emergency medical care, when needed, is actually provided in accordance with the plan.
9. Yes No All emergency medical delivery is done in accordance with standardized protocols.
10. Yes No Competent emergency medical care, if provided onsite, is certified to at least the basic first aid.

MEDICAL PROGRAM

- 11. Offsite providers of emergency medical care, if utilized, are medical doctors, registered nurses, paramedics, emergency technicians or certified first responders. Yes No

- 12. All members of the workforce are aware of how to obtain competent emergency medical care. Yes No

Injury-Illness Management

- 13. An early-return-to-work program is in place at the facility. Yes No

- 14. Job descriptions are complete for all jobs and include the physical requirements of the job. Yes No

- 15. Light duty jobs have been identified which are productive, creative and not demanding to the worker. Yes No

- 16. The employer follows a prescribed protocol for early contact and close communication with the injured workers health providers which facilitates return to regular or modified work at the earliest possible date. Yes No

- 17. Employees are aware of, and fully support the early-return-to-work program. Yes No

WorksiteScore

Total number of "Yes" responses:		Total number of responses:		Divide number of "Yes" responses by total number of responses		Multiply by 100 = your score	
	÷	17	=		x100 =		%

Safety and Health Training

OBJECTIVE:

Ensure that all employees understand the hazards to which they may be exposed and how to prevent harm to themselves and others from exposures to these hazards, so that employees accept and follow established safety and health protections.

So that supervisors will carry out their safety and health responsibilities effectively, ensure that they understand those responsibilities and the reasons for them.

Ensure that managers understand their safety and health responsibilities, so that the managers will effectively carry out those responsibilities.

Introduction

After establishing organizational policy, goals, objectives and critical success indicators and communicating those issues throughout your organization, the next step is to provide training for managers, supervisors and employees. This training will assist employees in meeting and (eventually) exceeding your objectives.

Training needs will vary from one organization to the other. However, all organizations will have to train new employees to do the job and to recognize and avoid potential hazards (to themselves and others) in the workplace. In addition, contract workers may require training in the hazards and potential hazards in your workplace.

The installation of new equipment may create a need for training, as would process changes that increase existing hazards or create new ones. Finally, all employees may require “refresher” or update training to keep them prepared for potential problems or emergencies.

Some safety and health training is also required by certain federal and state regulations. For example, program based standards include hazard communication and lockout/tagout.

Safety and health education is most effective when integrated into your organization’s overall training in performance requirements and job practices. It can range from the simple precautionary warnings given to new workers to more elaborate, formal instructions.

Factors in training design

Commitment and involvement – The success of training depends on the level of commitment among managers, supervisors and employees to the organization’s total safety and health program. Consider the following questions before designing and implementing a training program:



TRAINING

- Does the safety and health policy clearly address the organization's commitment to training?
- Were employees involved in policy development and/or has the policy been clearly communicated to them?
- Does the commitment include paid work time for training?
- How can management and employees be involved in developing the training program?
- What languages are best understood by employees?
- What resources are available to assist in developing a training program?

Remember that your primary focus must be on safety and health concerns that can best be addressed by training.

Teaching and learning principles – Training supervisors and employees need not be complex or lengthy. Consider the following basic principles as a guide to developing a training program.

Identify training needs – The worksite analysis and hazard prevention and control program would be a good source of information and ideas on training needs. Use your accident and near miss incident reports as another indicator of training needs. New work practices, processes, equipment and materials (including chemicals) introduce new hazards into the workplace. Your training must address these changes. You should also consider the following areas:

New employee training

- Training of contract workers and temporary employees
- Training for employees working in high hazard and/or special hazard areas
- Training in the use and maintenance of personal protective equipment
- Attitudes and perceptions of managers, supervisors and employees toward safety and health

NOTE: This will help you design a program that is geared toward reinforcing the positive and changing the negative.

Communicate the purpose – The employee must understand the purpose of the instruction.

Order the presentation – Information should be organized to maximize understanding.

Provide appropriate practice – Facilitate the immediate application of newly acquired knowledge and skills.

Give immediate feedback – Provide feedback to employees as soon as possible to ensure that their practices are perfect. Wrong practices, if not corrected, would undermine your program.

Account for individual differences – Develop different styles of training that are suitable to the individual needs of employees.

Develop learning activities – Develop your learning activities to meet the training needs identified. Be creative when choosing the methods and materials you will use in your training programs.

COMMON TYPES OF SPECIALIZED TRAINING

Safety and health training for managers

A good safety and health program is impossible without support and understanding from the top levels of the organization. Training managers in their responsibilities is necessary to ensure their continued understanding and support.

Managers must understand the importance of the safety and health program. They must communicate the program's goals and objectives to employees.

Training should emphasize the importance of managers' visibly showing their support for the safety and health program. They should be expected to set a good example by scrupulously following all of the safety and health rules.

SAFETY AND HEALTH TRAINING

These topics can be covered and illustrated with examples in a relatively short time. Training for managers should be repeated at least annually.

Safety and health training for supervisor

All employees should be involved in matters of safety and health. However, workers often are promoted to supervisory positions without adequate knowledge of how to train other employees in the safe and proper way to do the job.

Supervisors often do a lot of on the job training. Therefore, they also need to be taught how to train and how to reinforce training. Supervisors may need help in learning how to apply fair and consistent discipline. Such training can be provided by the supervisor's immediate manager, by the organization's safety personnel, or by outside training providers.

Safety and health training for employees

Job orientation – The format and extent of orientation training will depend on the complexity of hazards and the work practices needed to control them. Make sure that new employees start the job with a clear understanding of hazards and how to protect themselves and others. Employers frequently provide a combination of classroom and on the job training. Many have found it useful to have fellow employees trained to provide “peer training.”

Whether the orientation is brief or lengthy, supervisors should make sure that new employees receive instruction in emergency response procedures before they start their jobs.

All workers operating a motor vehicle on the job should be trained in its safe operation. Do not overlook the training of on premises drivers as well.

NOTE: Emphasize in the strongest possible terms the benefits of safe driving and the potentially fatal consequences of unsafe driving practices.

Personal protective equipment (PPE) Supervisors and employees must be taught the proper selection, use and maintenance of PPE. Since PPE sometimes can be cumbersome, employees may need to be motivated to wear it in every situation where protection is necessary.

Individual employees must become familiar with the PPE they are required to wear. This is done by handling it and putting it on. Proper fit is essential if the equipment is to provide the intended protection. The effectiveness of some PPE also depends on proper maintenance. Employees must be trained to maintain the equipment themselves or to see that others maintain it properly. Employees who are required to wear PPE in an emergency situation must also be included in the training program.

Emergency response Train all employees to respond to emergency situations. Every employee at every worksite must know:

- **Emergency telephone numbers** and who may use them, emergency exits and how they are marked, evacuation routes and signals alerting employees to the need to evacuate.
- **Evacuation drills** should be practiced at least annually, so every employee can become familiar with evacuation signals and procedures. Supervisors should practice accounting for every employee during the practice drills. The organization should also have procedures to account for visitors, contract employees and service workers (such as cafeteria employees). These individuals are commonly overlooked in emergency plans.
- **Periodic safety and health training** It is essential that employees receive periodic safety and health training to refresh their memories and to teach new methods of control. New training will also be necessary when OSHA standards change or when new standards are issued.
- **Safety meetings.** Many organizations will conduct monthly or weekly safety meetings. This works especially well in situations that change rapidly. Safety meetings remind workers of the upcoming week's tasks, the environmental changes that may affect them and the procedures they may need to protect themselves and others.

SAFETY AND HEALTH TRAINING

- **One on one training** is the most effective method. To do this, the supervisor periodically observes the employee at work. The supervisor will then meet with the employee to discuss safe work practices. This provides an opportunity to acknowledge safe work practices and to provide additional instruction to correct any unsafe practices observed. Positive feedback is this method's most powerful tool, it helps employees establish new safe behavior patterns and recognizes and reinforces desired behaviors.

Guidelines for conducting training

- Prepare employees for training by putting them at ease.
- Recruit employees who show signs of being good trainers of their co-workers. Prepare them to conduct this peer training.
- Explain the job or training topic. Determine how much your employees already know.
- Boost employees' interest in training by helping them understand its benefits.
- Pace the instruction to the employees' learning speed.
- Present the material clearly and patiently.
- Present only as much information in one session as employees can master.
- Have employees perform each step of specific operations and repeat your instructions and explanations.

NOTE: You must be satisfied that employees know how to do the job safely.

Encourage employees to divide into teacher/learner pairs or practice pairs. Check frequently for correct performance during the initial practice period. Reduce observation as employees become more proficient.

Encourage employees to build their new skills into their work, but caution them not to change newly learned procedures without first checking with you or with their supervisor.

Evaluating training programs

You must evaluate each training program. The evaluation will assist you in determining whether you achieved the goal of improving employees' safety and performance. The evaluation will also highlight the training program's strengths and areas for improvement.

Design a plan for evaluating training sessions as needs are identified and training developed. This plan should not be put off until training is completed.

The following are some options for evaluating training programs:

- Before training begins, determine what areas need improvement by observing workers and soliciting their opinions. When training ends, test for improvement by again observing workers.
- Conduct individual employee interviews to ensure employees understand and can explain the hazards associated with their job, protective measures and newly acquired skills and knowledge.
- Keep track of employee attendance at training sessions.

NOTE: Absenteeism can signal a problem with the employee, but can also indicate a weakness in training content and presentation.

At the end of a training session, ask participants to rate the course and the trainer. Compare pre and post training to injury and accident rates.

Evaluation will allow you to calculate the effectiveness of training programs. Once you have made the effort to provide employee safety and health training, you must answer these questions:

- Have the goals of training been achieved?
- Do the results justify offering the training program again?
- Can the training program be improved?

Recordkeeping

A recordkeeping system for training programs offers specific benefits to the organization. A simple form can be used to identify the trainee, the topic or job and the training date.

Provide space for a brief evaluation of the individual employee's participation and success.

Such records will help ensure that everyone who needs training receives it, that refresher courses are provided at regular intervals, and that documentation is available (when needed) to show that appropriate training was conducted.

ATTRIBUTES **of** EXCELLENCE

Employee Training and Ability

1. Yes No An employee safety and health training program exists at the facility.
2. Yes No The training is provided to all employees, unless proficiency in the knowledge and skills being taught have been effectively demonstrated.
3. Yes No The training covers all legally-required subjects.
4. Yes No The training covers hazards (awareness, location, identification and protection or elimination).
5. Yes No The training covers the facility safety system (policy, goals and objectives, operations, tools and techniques, responsibilities and system measurement).
6. Yes No Training is regularly evaluated for effectiveness and revised accordingly.
7. Yes No Post training knowledge and skills are tested or evaluated to ensure employee proficiency in the subject matter.
8. Yes No The training system ensures that the knowledge and skills taught are consistently and correctly applied by the employees.

Supervisory Training and Ability

9. Yes No A supervisory safety and health training program exists at the facility.
10. Yes No The training is provided to all supervisors, unless proficiency in the knowledge and skills that are being taught has been effectively demonstrated.
11. Yes No The training covers all subject matter delivered to employees to the extent necessary for supervisors to evaluate employee knowledge and skills and to reinforce or coach desired employee safety and health behaviors.
12. Yes No The training covers the facility safety system (policy, goals and objectives, operations, tools and techniques, responsibilities and system measurement).

SAFETY AND HEALTH TRAINING

- 13. The training covers supervisory safety and health responsibilities. Yes No
- 14. Training is regularly evaluated for effectiveness and revised accordingly. Yes No
- 15. Post-training knowledge and skills are tested or evaluated to ensure supervisory proficiency in the subject matter. Yes No
- 16. The training system ensures that the knowledge and skills are consistently and correctly applied by the supervisors. Yes No

Management Training and Ability

- 17. A management safety and health training program exists at the facility. Yes No
- 18. The training is provided to all managers, unless proficiency in the knowledge and skills being taught have been effectively demonstrated. Yes No
- 19. The training covers all subject matter delivered to employees and supervisors to the extent necessary for managers to evaluate employee supervisory knowledge and skills and to reinforce or coach desired safety and health behaviors. Yes No
- 20. The training covers the facility safety system (management concepts and philosophies, policy, goals and objectives, operations, tools and techniques and system measurement). Yes No
- 21. The training covers management safety and health responsibilities. Yes No
- 22. Training is regularly evaluated for effectiveness and revised accordingly. Yes No
- 23. Post-training knowledge and skills are tested or evaluated to ensure management proficiency in the subject matter. Yes No
- 24. The training system ensures that the knowledge and skills taught are consistently and correctly applied by the managers. Yes No

WorksiteScore

Total number of "Yes" responses:

Total number of responses:

Divide number of "Yes" responses by total number of responses

Multiply by 100 = your score

÷

=

x100 =

%

Program Review

OBJECTIVE: *Review*

The next step

program operations at least annually to evaluate their success in meeting the goal and objectives, so that deficiencies can be identified and the program and/or the objectives can be revised when they do not meet the goal of effective safety and health protection.

After your organization's safety and health program is written and in place, measurable goals have been established, objectives, procedures, activities and resources to achieve them have been identified, and all employees including managers and supervisors have been trained, what happens next?

The next step involves conducting annual reviews of the safety and health program to determine how well the program is working.

Program review goes beyond inspections or audits. Inspections are valuable for reviewing the organization's facilities, processes and individual jobs to identify and eliminate or control hazards; audits are useful for looking at specific program activities to determine whether the objectives of the activity have been met.

Beyond the tools of inspecting and auditing is program review. Program review is concerned with larger questions aimed at assuring the quality of the safety and health program. The program review looks at the systems created to implement the safety and health program. It asks whether these systems are working effectively and efficiently.

What systems should be reviewed? The organization should review all systems that contribute to the safety and health program. (This includes the systems developed through this workbook.) When you identify needs that should be addressed, you have the basis for new safety and health objectives for program improvement.

Reviewing and revising the goals and objectives of the safety and health program is critical to achieving your vision of a safe and healthful workplace. High-quality programs demand continuous improvement. Organizations should never be complacent about safety

PROGRAM REVIEW



REVIEW

and health in the workplace. A periodic review of each program component will help you to achieve and maintain the vision reflected in the policy statement.

Guidelines

The following general guidelines can assist your organization with its annual review of the program:

- Schedule a review quarterly, semi-annually or annually.
- Look at each critical component to determine what is working well and what changes, if any are needed.
- Communicate any program change(s) throughout the organization.

NOTE: Any changes should also reflect the organization's continued commitment to the occupational safety and health program.

ATTRIBUTES **of** EXCELLENCE

1. Yes No The safety and health program is reviewed at least annually.
2. Yes No The criteria for the safety and health program review is against the OSHA Safety and Health Program Management Guidelines or other national consensus criteria in addition to the facility goal and objectives and any other facility-specific criteria.
3. Yes No The review samples evidence over the entire facility or organization.
4. Yes No The review examines written materials, the status of goals and objectives, records of incidents, records of training and inspections, employee and management opinion, observable behavior and physical conditions.
5. Yes No Review is conducted by an individual (or team) determined competent in all applicable areas by virtue of education, experience and/or examination.
6. Yes No The results of the review are documented and drive appropriate changes or adjustments in the program.
7. Yes No Identified deficiencies do not appear on subsequent reviews as deficiencies.
8. Yes No A process exists which allows deficiencies in the program to become immediately apparent and corrected in addition to a periodic comprehensive review.
9. Yes No Evidence exists which demonstrates that program components actually result in the reduction or elimination of accidents.

WorksiteScore

Total number of "Yes" responses:

÷

Total number of responses:

=

Divide number of "Yes" responses by total number of responses

x100 =

Multiply by 100 = your score

 %

Safety Related Links

American National Standards Institute
www.ansi.org

American Industrial Hygiene Association
www.aiha.org

American Board of Industrial Hygienists

American Society of Safety Engineers
www.asse.org

American Cancer Society
www.cancer.org

Americans With Disabilities Act Document Center
www.public.iastate.edu/~sbilling/ada.html

Board of Certified Safety Professionals
www.bcsp.com

Bureau of Labor Statistics
<http://stats.bls.gov>

Mine Safety and Health Administration
<http://199.115.12.200>

National Fire Protection Association
<http://roproc.nfpa.org/home.html>

National Institute for Occupational Safety and Health
www.cdc.gov/niosh/homepage.html

Occupational Safety and Health Administration
www.osha.gov

Oklahoma Department of Labor
www.state.ok.us/~okdol

Oklahoma Department of Environmental Quality
www.deq.state.ok.us

OSHA Salt Lake Technical Center U. S. Congress
www.thomas/loc.gov

U. S. Department of Transportation
www.dot.gov

U. S. Environmental Protection Agency
www.epa.gov

U.S. Department of Labor
www.usdol.gov

U.S. Department of Energy
www.doe.gov



**The Oklahoma
Department of Labor**

4001 Lincoln Boulevard
Oklahoma City, OK 73105