

INDUSTRIAL CONSULTANTS
Safety Management

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Guidelines for Safety and Health Programs: Management of Facility Hazards

In this modern world of business, it is extremely important and wise to have an established safety and health program at your facility.

A monetary benefit of a safety and health program is evident when viewed from the point of cost avoidance and cost savings. Costs associated with occupational accidents, injuries, illnesses and other conditions will include not only direct costs, but also more importantly, high indirect costs. Therefore, an effort to control the rate and severity of these losses becomes a prudent action for effective management.

OSHA representatives have noticed that where effective safety and health management is practiced, the injury and illness rates are significantly less compared to like operations.

Another benefit made by OSHA's observations points out that facilities reported improved moral and productivity with its employees as a by-product of starting safety programs. This was observed regardless of industry type, size, or nature of activity.

As a result of OSHA's observations, commentaries from facility operators, and consensus standards issued by industrial associations, OSHA wrote a guidance document called, "Safety and Health Program Management Guidelines". In 1996, OSHA updated this with its "Program Evaluation Profile (PEP) example. Both are available on the Internet at www.osha.gov. Although the specifics of these guidelines are "voluntary", please understand that the intent can be applied to the "general duty clause".

Important Notice: Some states have made this plan a mandated requirement for every employer.

Start with a Policy:

A health and safety policy is a statement of your company's values and philosophy towards safety, health and employees. It should:

- Reflect your company's commitment involving management and employees
- State who is ultimately responsible
- Be signed by Management and an Employee Representative.
- Be visible and accessible
- Be reviewed each year

Elements of a basic Program:

Following will be a discussion of the six elements, considered by OSHA, to be important to an effective safety and health program:

1. Management Commitment and Employee Participation.
2. Workplace Hazards Assessment
3. Accident and Record Analysis
4. Hazard Prevention Control
5. Emergency Response
6. Safety and Health Training

Now, if you are saying to yourself - another written program! - OSHA answers that with this quote: "the extent to which the program is described in writing is less important than how effective it is in practice."

Program Element: Management Commitment and Employee Participation

In an effective program, management commitment and employee participation must be complementary. The challenge is to establish a program where both management and employees participate in its ownership. OSHA has some suggestions:

- State workplace safety and health policies clearly. These pertain to all personnel in a facility.
- Establish goals and objectives so that personnel understand the desired results, and how they will be measured.
- Provide top management involvement.
- Provide for employee involvement. When people have an “investment” in a program, whether management or employee, there is usually more commitment and energy that goes with their involvement.
- Assign responsibilities across the level of personnel and work areas. Every sector of a facility should feel they have a part to play in safety and health of the workplace.
- Provide adequate authority and resources (a.k.a. money), so that responsibilities can be met.
- Hold managers, supervisors and employees accountable for the implementation of the program.

Unless both employees and management perceive the need for a safety and health program, and unless they both take responsibility to ensure that policies, procedures, and practices are followed, the program will not be successful. The program must “*belong to*” all personnel in a facility.

Program Element: *Workplace Hazards Assessment*

The identification of workplace hazards and potential hazards requires active and on-going involvement. As the workplace changes, whether it be equipment, management or employees, the potential for hazards also changes.

This part of the program guidelines is not necessarily – voluntary. There are OSHA regulations all ready in place that call for hazards assessment, such as –

1910.132(d): “The employer shall assess the workplace to determine if hazards are present, or are likely to be present, which necessitate the use of personal protective equipment (PPE).”

This standard also requires written verification of the assessment. To help the employer, OSHA has provided a guideline to use with this assessment in **Appendix B of 1910.132**. This can be found on the Internet at www.osha.gov. There should be no “excuses” for not having completed this element of a safety and health program.

Hazards assessment is not a one-time procedure, it needs to be reviewed on a routine basis. The frequency and scope will depend on the nature, complexity and severity of hazards at the worksite.

Also remember, identification of safety and health hazards at a worksite was the critical foundation for the origin of the Occupational Safety and Health Act of 1970 (OSHA). Therefore, they take this element of the program quite seriously.

Program Element: *Accident and Record Analysis*

Even though assessments and training are completed at a facility, there will be accidents or “near misses”.

This section of the program should include:

- The investigation of these incidents by individuals or teams (depending on the complexity) who are familiar with hazards assessment. The report should contain information that describes the environment of the incident, the cause and recommendations for prevention.
- An analysis of how this hazard was missed at the initial or annual assessment of the workplace, should follow.
- Recommendations should be evaluated and acted upon by management. These reports should be available to employees for review.
- All levels of management and workforce should be made aware of the resulting preventive action.
- Review the safety and health program at least annually to evaluate its success in meeting the goals of your policy.
- Revise policies or procedures based on the review.
- Analyze injury and illness trends over time, so that patterns with common causes can be identified and prevented.

Program Element: *Hazard Prevention Control*

An effective safety and health program prevents or controls identified hazards. After a workplace assessment has been completed, management must prepare to minimize job-related injuries and illnesses.

Management action at this point will determine the credibility of the safety and health policy and the usefulness of the entire program. These actions may include:

- Engineering techniques or re-design
- Specific safe-work procedures
- Provision for personal protective equipment
- Administrative control, such as exposure time
- Preventive maintenance program

When specific safe-work procedures are the means of protection, it is critical that management ensure they are followed. The reliability of the program will depend on this action.

If trained employees continue unsafe actions, it should be determined why this condition continues. It is possible that some condition of the work environment has made it difficult to follow a procedure, such as an hazardous condition, production quotas/time pressure or inadequate training. If after these conditions have been corrected an employee continues an unsafe action, corrective action must be applied. OSHA concludes that “there is little possibility of effective safety and health protection without carefully designed rules for safe and healthful practices that cover all personnel, from the site manager to the hourly employees.” To be effective, corrective discipline must be applied consistently to all, regardless of role or rank.

Once these work practices are established and those who are expected to follow them understand **why** it is important to follow them, it is OSHA’s experience that there is usually little need to make use of the corrective disciplinary system.

When an accident or injury does occur, the availability of first aid and emergency medical care are essential. In order to minimize the harmful consequences of an injury or illness a medical program must be established. Again, this portion of the “Safety and Health Program Management Guidelines” is not necessarily voluntary. There are many OSHA regulations that have Medical requirements, starting with OSHA 1910.151.

Program Element: *Emergency Response*

This element of a safety and Health Program is **not voluntary!** Planning and training for emergencies is essential in minimizing the harmful consequences of an accident or workplace threat. Appropriate personnel need to be thoroughly trained to react to emergencies. Their responses should be immediate and clear-cut. The nature of emergencies depends on facility operations, hazard conditions, and its geographical location.

Several OSHA standards incorporate emergency training. The most basic of which is 1910.36, 1910.37, and 1910.38. The first two standards pertain to the requirement for exits, fire drills, fire alarm systems, building escape ways, discharge areas from exits, exit signs, and other requirements for “means of egress”.

The third regulation concerns **Emergency Action Plans**. Essentially these are the requirements for a written plan that details escape procedures for any type of emergency condition that could occur at a facility. The most familiar being fire, but these procedures must also cover disasters such as tornadoes, earthquakes, or electrical outages. If a facility has a large quantity of a harmful chemical, such as ammonia, then escape procedures must be detailed to ensure that employees do not evacuate into the chemical spill area.

In addition to the Emergency Action Plan – 1910.38(a), if your facility has ammonia, there must also be a written **Emergency Response Plan** – 1910.120(q). This plan will detail the procedures and actions of emergency responders or maintenance personnel that will react to a chemical spill or leak.

Program Element: *Safety and Health Training*

Education and training are essential for communicating the requirements of an effective safety and health program. Managers, supervisors and other employees cannot perform their responsibilities in a program without learning protective procedures.

This training need not be a separate class, but should be part of all job practice training, such as good work practices, or the operation of a particular machine.

It must also be noted that a training class must include some method of verifying comprehension. This might be in the form of formal testing, oral questioning, or observation. Managers and

supervisors need to take the time to discuss safety procedures with each employee at some time.

Employees need to understand the hazards to which they may be exposed and how to prevent harming themselves or others. The extent of hazard information that is needed will vary, but OSHA recommends at least the following:

- The general hazards and safety rules of the worksite.
- Specific hazards, safety rules and practices related to particular work assignments.
- Employee's role in emergency situations.

In order for **supervisors** to carry out their safety and health responsibilities effectively, OSHA recommends training that includes the following:

- Analyzing the work under their supervision to identify potential hazards. (Job analysis)
- Physical protections that should be maintained in the work are (machine guards, respirators, etc.)
- Methods to use with employees for continual performance feedback, such as reinforcing the use of safe work practices.

First-line supervisors have an especially critical role in safety and health protection.

Due to the nature of safety and health being considered more of a "workers" responsibility, safety training for **managers** is sometimes overlooked. If a safety and health program is to survive, it must have top management commitment both in structure and in **money**. Since management controls the budget, it is very important that they be included in worksite training courses. An effective safety and health program not only protects employees, but it protects the company.

Now - What Do I do?

Don't give up yet! There are many resources for help. These include some very thoroughly written plans that you can use to format your own facility plan.

The following are all on the Internet. You will need at least a ream of paper if you intend to print all of these, although, that is not a bad idea.

"Guide To Your Written Health and Safety Program", & "Principles of Accident Investigation and Analysis"
State of Wisconsin Department of Administration -

(www.doa.state.wi.us/dsas/risk/slc.asp) Scroll down to the Manuals / Guidelines section. As you review this website you will see that it is filled with exceptionally helpful examples and models of many safety programs.

"Injury and Illness Prevention Program"

California OSHA Publications –

(www.dir.ca.gov/dosh/puborder.asp) Scroll down to Injury and Illness Prevention Program. For a model program, click on "For High Hazard Employers". California is a state that requires every employer to have a written health and safety program. It is called an Injury and Illness Prevention Program (IIPP). This site also has some other fine pamphlets and safety information.

"Accident Prevention Program Template"

Washington State University –

(www.ehs.wsu.edu/ohs/ohs-accident.htm) This site will allow you to print or download the template easily. It is filled with guidelines, fill-in statements, charts, forms, etc. for use with a safety and health program.

"Framework for a Comprehensive Health and Safety Program in Nursing Homes"

Federal OSHA –

(www.osha-slc.gov/SLTC/nursinghome/training/frame.html) Although this is not for refrigerated warehouses, there is some very good information on outlining a safety and health program.

For some lighter reading:

"How To Develop a Simple, Cost-Effective Safety & Health Program" - ACGIH

(www.acgih.org/about/committees/Sbguide.htm)

"Tools for a Safety and Health Program Assessment"

Federal OSHA –

(www.osha-slc.gov/doc/outreachtraining/htmlfiles/evaltool.html)

"Safety and Health Programs Sample Forms"

State of Vermont –

(www.state.vt.us/labind/Vosha/safetyhealthprog.htm)

"NASA Safety and Health Program Policy"

NASA Policy Directive –

(<http://ohp.ksc.nasa.gov/policies/npd/npd871.html>)