

PROGRAM OF SAFETY AND INDUSTRIAL HYGIENE

4.1 safety planning: What Is an OSHA Safety Plan?

An OSHA Safety Plan is a written document that describes the process for identifying the physical and health hazards that could harm workers, procedures to prevent accidents, and steps to take when accidents occur. The written safety plan is your blueprint for keeping workers safe. Many organizations compile their activity-specific safety plans into a single safety manual.

Why Have a Written Safety Plan?

Federal [OSHA](#) and at least 24 states require written safety plans for specific workplace activities and for more than a dozen chemicals. Many states require written safety and health plans under workers' compensation rules. Many organizations adopt voluntary safety plans to increase worker productivity, to prepare for special emergencies, and for workplace security.

OSHA Mandatory Written Plans

Out of all of OSHA's many safety rules, there are 18 for general industry workplaces that require written plans or procedures and 10 written construction safety plan requirements for the construction industry. There are also requirements for written safety procedures for 16 hazardous substances listed under Subpart Z of the general industry rules for Toxic and Hazardous Substances, such as asbestos and vinyl chloride.

Activities or safety programs that require written OSHA safety plans include:

- Hazard Communication (29 CFR 1910.1200(e))—Failure to have a written chemical worker right-to-know plan is a very frequently cited OSHA violation
- Emergency Action Plan and Fire Prevention Plan (29 CFR 1910.38 and 29 CFR 1910.39)
- Bloodborne Pathogens Exposure Control Plan (29 CFR 1910.1030(c)) at facilities that anticipate employee exposure to blood
- HAZWOPER Safety and Health Plan (29 CFR 1910.120(b))
- Respiratory protection, permit-required confined spaces, lockout/tagout, process safety management, construction fall protection, and construction excavations

Basic Safety Plan Elements

OSHA recommends that each written plan include the following basic elements:

- Policy or goals statement
- List of responsible persons
- Hazard identification
- Hazard controls and safe practices
- Emergency and accident response
- Employee training and communication
- Recordkeeping

MANAGING YOUR HEALTH & SAFETY PROGRAM

Your health and safety plan (your accident prevention “program” in writing) is a valuable tool for organizing and managing the various aspects of an effective health and safety program in your unit.

- It provides for a safe and healthful work environment by identifying and controlling hazards.
- It provides a mechanism for organizing thoughts and approaches and documenting activities. The process of “working it through” is as important as the Plan, itself.
- It provides a structure for action, especially in an emergency.
- It helps compliance with Federal and State regulations, contributes to the UW being a good citizen in the community, and helps avoid the citations and penalties associated with non-compliance.

Employees must be empowered to plan, organize, coordinate and, most importantly, participate in the safety process. By doing so improvement in safety at our company is both controllable and measurable. You cannot buy a program and expect it to work in every department, safety is an internal process that is controlled from the outside.

Every employee is an equal partner in the safety process. There is no boss-subordinate relationship, no rank when it comes to safety. You either have a safe attitude or you do not, and since your behavior is dictated by your attitude, safety

must be a part of work not merely a requirement of work. Each employee has unique skills to bring to the Safety Committee's mutually shared goal of working in a safe manner.

Empowering employees to make more decisions has positive results. Employees come to work thinking of working safely and managers have more time to work other issues, confident that safety issues are being handled in a quality manner by the Safety Committee.

The punitive aspects of safety regulations are de-emphasized and replaced by a positive, lessons-learned approach.

A strong emphasis is placed on a trusting relationship between management and employees.

Committee membership should be on a rotating basis, involving as many people in the problem solving process as possible. The establishment of the team complete, the next item on the agenda is the development of a system that will clearly communicate, to the entire company, the mission, vision, goals and objectives of the committee when it comes to addressing workplace safety.

4.2 establishment of policies: Why worry about safety? Because failing to do so could literally destroy your business. Besides your ethical responsibility toward your employees, workplace accidents cost money and time. You could be liable for substantial penalties that could wipe out your business's cash flow. The Occupational Safety and Health Administration's (OSHA) penalty for willful violations of safety rules that could result in death or serious physical harm is \$5,000 to \$70,000. So paying attention to safety is definitely worth your while.

OSHA Regulations

All employers, whether they have one employee or 1,000, are subject to federal OSHA requirements. However, in states where a federally certified plan has been adopted, the state plan governs. State standards must be at least as strict as the federal standards.

Business that use nonemployee workers, such as independent contractors or volunteers, are not subject to OSHA. Workers are considered employees under OSHA if you:

- Control the actions of the employee
- Have the power to control the employee's actions
- Are able to fire the employee or modify employment conditions

Small employers (with 10 or fewer employees) don't have to report injuries and illnesses. However, that doesn't mean they are exempt from OSHA regulations.

Compliance With OSHA

The first step in complying with OSHA is to learn the published safety standards. The standards you must adhere to depend on the industry you're in.

Every business has to comply with general industry standards, which cover things like safety exits, ventilation, hazardous materials, personal protective equipment like goggles and gloves, sanitation, first aid and fire safety.

Under OSHA, you also have a general duty to maintain a safe workplace, which covers all situations for which there are published standards. In other words, just because you complied with the standards that specifically apply to your industry doesn't mean you're off the hook. You also need to keep abreast the government may have thought of and published standards for.

Sound exhausting? Help is available. Start with your insurance carrier. Ask if an insurance company safety specialist can visit your business and make recommendations. Insurers are typically more than happy to do this since the safer your business is, the fewer accident claims you'll file. The government can also help you set up a safety program. Both OSHA and state safety organizations listed

in the government pages of your phone book, usually under "Labor Department," "Department of Commerce" or a similar name.

Don't forget to tap into the resources of your chamber of commerce, industry trade association and other business groups. Many offer safety seminars and provide safety training literature free or for a nominal charge. In addition, there are private consultants who can help small businesses set up safety programs that meet OSHA regulatory standards. Your lawyer may be able to recommend a good one in your area.

Put It in Writing

When you have a safety program in place, put it in writing with a safety manual. Your safety manual should explain what to do in the event of a fire, explosion, natural disaster or any other catastrophe your business may face. Make sure you keep well-stocked fire extinguishers and first-aid kits at convenient locations through out your building. Also make sure employees know where these are located and how to use them. In addition to emergency procedures, your safety manual should explain proper procedures for performing any routine tasks that could be hazardous. Ask employees for input here; they are closest to the jobs and may know about dangerous situations that aren't obvious to you.

Finally, have an insurance professional, a government representative and an attorney review the finished manual. You're putting your company's commitment to safety on the line, so make sure you get it right.

Emphasize the importance of safety with meetings, inspections and incentive programs. These don't have to cost a lot (or anything). Try establishing a "Safe Employee of the Month" award or giving a certificate for a free dinner for winning suggestions on improving safety.

4.3 evaluation of the program: OSHA's assessment of safety and health conditions in the workplace depends on a clear understanding of the programs and management systems that an employer is using for safety and health compliance. The Agency places a high priority on safety and health programs and wishes to encourage their implementation.

1. *Evaluation of Workplace Safety and Health Programs.* In the past, compliance officers have evaluated employers' safety and health programs, but those evaluations have not always required thorough documentation in case files. More detailed evaluation and documentation is now required to meet the Agency's need to assess such programs accurately and to respond to workplace compliance conditions accordingly.