

ASSESSING SAFETY & HEALTH MANAGEMENT PROGRAMS

Individual Assessment Guide

Developed by

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INTRODUCTION

The Occupational Safety and Health Act of 1970 (OSHAct) obligates each employer to provide and maintain a safe and healthful workplace for all employees. To meet this obligation, employers need to effectively manage safety and health in the workplace. This manual describes those essential elements and actions necessary for designing an effective and functioning workplace program. Essential elements and actions are:

1. **Management Leadership and Employee Involvement (starts on page 5)**
 - Having a Safety and Health Policy
 - Setting a Goal & Developing Objectives
 - Assigning of Responsibilities
 - Getting Top Management to Provide Leadership
 - Getting Employees Involved
 - Provide Adequate Authority/Resources
 - Giving & Receiving Accountability
 - Providing Program Evaluations
2. **Worksite Analysis (starts on page 23)**
 - Comprehensive Hazard Identification
 - Regular Site Safety & Health Inspections
 - Employee Reports of Hazards
 - Accident & Incident Investigations
 - Injury & Illness Trend Analysis
3. **Hazard Prevention and Control (starts on page 35)**
 - Appropriate Controls
 - Preventive Maintenance
 - Emergency Preparation
 - Medical Program
4. **Safety and Health Training for Employees, Supervisors, Managers (starts on page 46)**

Many employers believe they have a safety program but have never assessed their program to find out. This manual will help in evaluating the effectiveness of your safety and health program. You can compare your program elements with those elements OSHA uses to describe effective and functioning workplace program. In addition you have a systematic means of determining how yours actually measures up.

One section of the manual contains a worksheet to help in identifying problems and focus on strategies that when carried out can cause program improvement. The manual and worksheets are applicable to all types of industry - manufacturing, construction, service industry and nonprofit. We think it provides the user with a tool to assess the effectiveness of a program already in place and to identify areas that need improvement. It is especially useful for the small employer who must make provisions for a safe and healthful workplace. It is a primary tool to aid in evaluating a workplace safe program and in simplifying the diagnostic process.

Each subject is presented in two parts. The first part contains key questions to objectively qualify and quantify each element on a performance basis. The second part contains a brief explanation of the key elements that must be in place in order to have an effective program.

We devised a scoring system in an attempt to quantify the effectiveness of the program; the scoring system is not an absolute that can be applied in all situations. A numerical value is assigned for each "Yes" answer and receives a numeric value of one point. Modify the numeric value to fit particular circumstances that vary from employer to employer. As an example, on the question asked "Is management's safety attitude communicated to employees orally and in writing". However, if one of the two actions is not done, assign one-half point.

It is not necessary to be able to answer "Yes" to each question asked. No safety and health program is perfect and it's unlikely that any program will receive a perfect score. If however, your safety and health program does not measure up to 80% (see Final Assessment Worksheet), you may want to incorporate the activity suggested by the question into your existing program.

SITUATION	POTENTIAL CAUSES	COUNTERMEASURE
<p>Poor safety performance resulting in high insurance premiums, production delays and poor company image</p>	<p>Lack of leadership</p> <p>Lack of supervision</p> <p>Need for more safety control</p> <p>Lack of skill</p> <p>Attitude</p>	<p>A1, Policy A4, Leadership</p> <p>A3, Responsibility A4, Leadership A7, Accountability D1, Supervisor Training</p> <p>B1, Hazard Inventory B5 Trend Analysis C1, Appropriate Controls</p> <p>D1, Employee Training</p> <p>A5, Involvement A4, Positive Reinforcement A6, Authority/Resources</p>
<p>Number of preventable accidents attributed to one individual</p>	<p>Program elements not in place or not effective</p> <p>Lack of direction</p> <p>Health problems</p> <p>Personal problems</p>	<p>A8, Program Evaluation</p> <p>A2, Goal & Objective</p> <p>C4, Medical Program</p> <p>A4, Leadership C4, Medical</p>
<p>High turnover, high absenteeism</p>	<p>Low morale</p>	<p>A1, Policy A5, Empl Involvement</p>

SITUATION	POTENTIAL CAUSES	COUNTERMEASURE
Accidents due to equipment failures	No preventative maintenance program; inadequate maintenance Inadequate inspections	C2, Preventive Maintenance B1, Comp. Survey B2, General Survey B3, Employee Reports D1, Training
Increased severity of injury	Lack of pre-planning	C3, Emergency Preparation
Damaged equipment leading to production losses	Need for investigations	B4, Investigations
Number of observed unsafe acts	Lack of leadership	A4, Leadership A7, Accountability D1, Training
OSHA violations or other unsafe conditions	Lack of leadership Lack of direction	A1, Policy A2, Goal & Objective

LEADERSHIP

Management Leadership and Employee Involvement

LEADERSHIP

- Policy, Goal, Objectives
- Responsibility
- Leadership
- Participation
- Authority & Resources
- Accountability
- Evaluation

Leadership is looked upon as the outside influence that shapes corporate culture. Management should provide leadership that encourages workers within an organization to participate in the programs offered by the company, in this case, the safety and health program. The elements of a safety and health program can be broken into the following components:

- A safety policy written and communicated to all employees.
- A goal established and objectives developed.
- Responsibilities are assigned.
- Top management provides visible leadership.
- Employees are involved and actively participate in the program.
- Employees have the authority and resources to do the task.
- Employees are held accountable for results.
- The program results are evaluated and changes made for continuous improvement.

A clear worksite safety and health policy allows employees to understand the importance of safety and health protection in relation to other organizational values such as quality and efficiency. Safety and health need to be corporate objectives, similar to sales and profits. Reducing compensation costs does have an immediate and extensive effect on the bottom line.

Policy statements signed by top management show that endorsement of the policy is from the top. A concern shown by top management for safety makes it easier for supervisors to carry out and enforce company policy, for the company to promote safe and healthful work practices, for employees to observe the stated policy, to purchase equipment that has been designed with safety features, and to maintain and repair equipment according to good engineering control and safety practices.

DO:

- **Develop a formal written policy statement in which the company declares its intent to provide a safe and healthful place of employment, which is signed by the business owner or other chief executive officer.**
- **Hold a meeting with all employees to communicate your safety and health policy and discuss your objectives for safety and health for the rest of the year.**
- **Post your policy and allow employees time to read and understand it.**
- **Ensure that newly hired employees are impressed during their orientation with the idea that safety is an important part of their job.**

Safety & Health Policy

KEY QUESTIONS	Maximum Points	Assigned Points
Has the owner (manager, president, etc.) expressed a positive attitude and commitment (policy) regarding safety and health?	1	
Is management's safety attitude (policy) communicated to employees in writing, orally and/or by actions?	1	
Do employees understand what the company priority is regarding a safe and healthful work environment in relation to other organizational values such as production and quality?	1	
Does the policy actively promote management commitment and involvement and employee participation?	1	
TOTAL POINTS	4	

You make your general safety and health policy specific by establishing a clear goal and objectives. These set the framework for assigning responsibility. Once a policy is developed, management should set a goal for safety and health, and then build objectives that will allow employees to reach the goal. The goal should be a realistic one, so as not to discourage employees from striving for the goal.

Once the goal is established, you can now set objectives and assign responsibilities. Set objectives based on performance measures and get others involved in establishing the objectives. Each employee should be able to see his or her work activities moving toward the goal, thus allowing them to meet the objectives.

DO:

- **Establish a numeric or descriptive goal to make your policy specific.**
- **Identify objectives that are most important to your program goal which help you create an effective program.**
- **Set objectives based on indicators, which tell you whether you did, or did not perform as expected.**
- **Assign a person to carry out the activity indicated in the objective.**
- **Discuss the goal and objectives with all employees through meetings, letters or postings.**

SETTING A GOAL AND DEVELOPING OBJECTIVES

KEY QUESTIONS	Maximum Points	Assigned Points
Is a goal established (i.e. what you want to accomplish by establishing a safety and health program in the first place) and communicated to all employees?	1	
Will the goal help you in achieving a safe and healthful workplace?	1	
Is progress toward the goal tracked and monitored?	1	
Are measurable objectives established which will lead to the desired results for a safety and health program?	1	
Did employees participate in setting the objectives?	1	
Do managers and supervisors have a clear idea of their objectives for worker safety and health?	1	
Do the employees understand what the company does to ensure safe and healthful working conditions?	1	
TOTAL POINTS	7	

Everyone should have some responsibility for safety and health in the workplace. It should be clearly understood by all employees what their responsibilities are in the workplace, and what discipline will be forthcoming if failure to carry out these responsibilities should occur. The employer should try to base responsibility on the goal and set objectives. This way everyone knows what the goal is, and will try to meet the objectives that were set. Put responsibilities in writing and specify responsible parties. Giving people responsibility and accountability for their actions instills a sense of pride, which will carry over in terms of wanting to have a good performance record.

DO:

- **Make clear assignments of responsibility for every element of the program you develop. Make certain that everyone understands them.**
- **Ensure through a periodic audit that safety responsibilities are known and are being carried out.**
- **Include safety responsibilities in the periodic employee review.**
- **Hold all employees accountable for results.**
- **Develop a positive way to reward good safety performance.**

Assigning Responsibilities

KEY QUESTIONS	Maximum Points	Assigned Points
Are responsibilities in writing so that it is clear who is responsible for all the duties either specified or implied in the safety program?	1	
Is every employee trained so that they are capable of operating safely and are held accountable for safety?	1	
Are safety/health activities part of the performance appraisal?	1	
Is someone responsible for safety in each department and on each shift?	1	
TOTAL POINTS	4	

If it is perceived by employees that management fully supports and abides by the safety and health program, they are more likely to emphasize safety and health in their own work habits. Employees follow management's lead.

DO:

- **Make sure that support from the top is visible by taking an active part in the safety and health program.**
- **Personally review all inspection and accident reports to ensure follow-up when needed.**
- **Ensure that all managers and supervisors follow all safety requirements that employees must follow, even if they are only in the area briefly.**
- **Stop infractions of safety rules or work procedures you might notice; personally stop hazardous conditions or activities.**
- **Hold managers, supervisors and employees accountable for their actions.**
- **Take charge by letting it be known that safety and health are high priorities in your company.**
- **Reward good performance.**
- **Listen to employee concerns and correct deficiencies.**
- **Be "visible" to employees by making periodic walk-throughs.**

Getting Top Management to Provide Visible Leadership

KEY QUESTIONS	Maximum Points	Assigned Points
Does management actively take part in safety activities such as safety committees, accident investigations, and in-plant hazard surveys)?	1	
Does management set a good example by wearing safety equipment where required?	1	
Does management correct hazards observed while in the shop?	1	
Does management insist that outside contractors working on the premises abide by established plant safety rules?	1	
Does management take corrective action on all rule infractions?	1	
Does management promote safe work habits through positive reinforcement?	1	
Is management accessible so that employees can discuss safety concerns without fear of reprisal?	1	
Is management held accountable for corrective action and safe operation within their specific area?	1	
Does management respond quickly to correct hazards regardless of how identified?	1	
TOTAL POINTS	9	

Get employees involved. Decide what employee involvement means to you (i.e. asking for input *before* management decisions are made; or sharing the decision-making responsibility; or allowing employees to make decisions) and communicate this to employees.

The best worker safety and health protection occurs where everyone at the worksite shares responsibility for protection. This does not take the responsibility of the safety and health of the worker from the employer.

Management should encourage employees to have real input into the total safety program for a variety of reasons: employees often know best; it promotes high morale; and it indicates that the management cares. Employees should be encouraged to make suggestions that will decrease the danger of accidents to themselves and their fellow employees and reduce risks of damage to equipment and materials. Involving employees in developing their workplace safety and health program is a good way to obtain buy-in for the program.

DO:

- **Decide the extent of employee involvement and communicate to employees.**
- **Tell your employees what you expect of them.**
- **Promote employee involvement through safety committees or other advisory groups.**
- **Give employees adequate training and resources for the job expected of them.**
- **Require that departments use employees to develop safe work procedures for new tasks and processes.**
- **Provide a procedure for employees to report hazards.**
- **Ensure that employees are given a response to their safety concerns.**
- **Make sure coworkers hear about it when other employees' ideas are successful.**

Getting Employees Involved

KEY QUESTIONS	Maximum Points	Assigned Points
Have you decided what employee involvement means and communicated that decision to the employees?	1	
Are employees involved in the safety program, i.e., do employees participate in safety committees or other advisory groups (developing job hazard analysis, developing safety rules, training other employees, conducting site inspections or investigating accidents)?	1	
Are management and labor evenly divided on committees?	1	
Do committees/advisory groups meet on a regular basis and the results documented?	1	
Do committees/advisory groups have written objectives and responsibilities?	1	
Have employees received any special training in the activities if they are involved?	1	
Do employees feel that management is interested and involved in safety and health?	1	
TOTAL POINTS	7	

Any realistic assignment of responsibility must be accompanied by needed authority and resources. When an employee is given the responsibility to do something, the resources and authority to complete the task should be accompanying. As employees within the organization grow, they will take on more responsibility if they feel management is backing them. The employer should provide all the tools necessary for the employee to be successful at his or her task. As an example, safety equipment, meetings and related expenses should be budgeted because safety and health programs must be reflected as a legitimate function of the company. Providing employees adequate authority and resources makes them problem solvers, not problem givers.

DO:

- **Develop an annual safety budget.**
- **Prioritize expenditures regarding safety.**
- **Develop alternate safety measures for safety improvements that must be postponed due to lack of available funding.**
- **Give those with responsibility adequate resources and support (people, training, money), and authority to get the job done.**

Providing Adequate Authority and Resources

KEY QUESTIONS	Maximum Points	Assigned Points
Is adequate staff, time, money, training, authority provided so that supervisors and employees can carry out their assigned responsibilities?	1	
Is safety (time, training, equipment) a budgeted item?	1	
Are key safety employees sent outside to safety seminars and conferences?	1	
Do employees have an active voice in the decisions that affect the activity they are involved with; do they know the limits of their authority?	1	
Can staff members who have safety responsibility order parts or maintenance?	1	
TOTAL POINTS	5	

Once you have assigned responsibility and provided the appropriate authority and resources, hold people accountable for achieving what they have been asked to do. Accountability for one's actions must accompany the responsibility given and the authority and resources provided. Holding employees accountable helps them see how important they are to the total process within the company.

DO:

- **Enforce your program fairly and consistently.**
- **Build positive reinforcement into the safety program. This positive reinforcement can be in the form of:**
 - a. **Letter of appreciation signed by an officer of the company;**
 - b. **Certificate of service that can be framed and displayed in the worker's home;**
 - c. **Expression of appreciation at a group meeting.**
- **Reflect compliance with your safety program in employee performance evaluations.**
- **Reward effective safety performance as future behavior patterns are strengthened.**
- **Develop a disciplinary action program so that employees are held accountable once they have been trained.**

Giving and Receiving Accountability

KEY QUESTIONS	Maximum Points	Assigned Points
Is there a formal system in place in which employees, including line managers and supervisory personnel, are held accountable for safety and health activities (not for number of accidents) through performance evaluations?	1	
Is safety performance tied into salary increases, promotions or disciplinary action?	1	
Is discipline fairly and consistently enforced?	1	
Do employees know what happens when rules are broken?	1	
Is there complete documentation of enforcement for safety rules and procedures?	1	
TOTAL POINTS	4	

Once the safety and health program is in place and all components are functioning, management needs to check on it from time to time to ensure its effectiveness. Some key indices of safety and health performance are property damage; frequency rates, lost time injuries; high turnover or absenteeism; employee's perception of management's interest and involvement; and insurance claims. If the program is not working, the employer should decide why and try to resolve it. Some areas of the program may need more work; some procedures may need to be changed or added where current activities are not producing the desired results. A successful safety and health program will provide a sense of pride among employees, making them feel like they are accomplishing something.

DO:

- Review program at least annually using tools such as incidence rates; experience modification factors; worker's compensation costs; program goals and objectives.
- Make changes as needed

Providing Program Evaluations

KEY QUESTIONS	Maximum Points	Assigned Points
Is there a systematic review of safety performance on an annual basis?	1	
Does the review include checking documentation (accident reports, 200 Logs); interviews with employees at all levels; review of site conditions; review of program activities to verify they get results?	1	
Are outside personnel asked to participate in the annual review?	1	
Are changes made in the program when deficiencies are noted?	1	
TOTAL POINTS	4	

ANALYSIS

Worksite Analysis

ANALYSIS

- Hazard Identification
- Regular Inspections
- Reporting System
- Investigations
- Analyzing

Worksite analysis is a combination of systematic actions that provide the employer with the information necessary to recognize and understand the existing and potential hazards of the workplace. While these actions may appear complicated, they are really basic activities that are performed in most workplaces. It includes these actions:

- A comprehensive hazard identification program established and a hazard inventory completed.
- Regular site safety and health inspections are completed on a regular basis (i.e. monthly or more often).
- A system is established for employees to report hazards without fear of reprisal.
- An accident/incident investigation procedure is in place.
- A procedure for analyzing injury/illness trends at least annually established.

In order to design a program of prevention and control, an employer must have a comprehensive hazard survey, a change analysis, and a routine hazard analysis.

The comprehensive hazard survey is the most basic tool used to establish a prevention and control program. This survey should be performed by experts, preferably someone not involved with the workplace, who has a broad knowledge base of safety engineering, industrial hygiene and, if applicable, occupational medicine. This survey identifies current and possible hazards at the worksite. This survey should be performed on a periodic basis.

The second component used to build a prevention and control program is the change analysis. This analysis is conducted prior to a change in facilities, equipment, processes, or materials in the workplace. In this way, potential hazards can be identified before the change goes into effect. It will also provide a source of savings for the employer in that possible faulty designed can be located and changed before going into place.

The last component of the comprehensive hazard identification is the routine hazard analysis. The most basic form of routine hazard analysis is the job safety analysis. This analysis divides a job into tasks and steps, and then it allows for an analysis of potential hazards. A method of prevention and control can then be developed from the analysis that can eliminate the potential hazards.

DO:

- **Require periodic inspections, surveys or consultations from outside sources such as your insurance carrier or the onsite consultation project in your state. Require periodic industrial hygiene surveys.**
- **Develop procedures to be conducted by in-house personnel to support the improvement recommendations made in those surveys, such as insuring that ventilation systems are maintained, personal protective equipment is used, etc.**
- **Require that capital expenditures for new facilities or new equipment be reviewed from a safety aspect during their planning stages.**
- **Secure from equipment manufacturers use and servicing instructions for all equipment in use.**
- **Ensure that your operating procedures are consistent with safety rules furnished by the manufacturer and that they are adequate to protect your workforce.**
- **Develop specific safe work procedures using job hazard analysis techniques for tasks where the procedures are insufficient or lacking.**
- **Perform routine job hazard analyses on all new tasks, tasks involving new machinery or processes, and tasks identified as being involved in accidents.**

Comprehensive Hazard Identification

KEY QUESTIONS	Maximum Points	Assigned Points
Is the safety and health impact of new equipment, materials or processes evaluated before purchase and implementation (change analysis)?	1	
Do employees show knowledge and understand limitations of personal protective equipment and safety devices?	1	
Are engineering/and or administrative controls routinely evaluated to ensure effectiveness?	1	
Does management understand principles (hierarchy) of control (i.e. engineering, controlling, work rules and safe work practices, personal protective equipment, administrative controls)?	1	
Does the company perform Job Safety Analysis (JSA)?	1	
Do outside experts perform a comprehensive safety survey and provide an inventory of hazards identified?	1	
Are procedures in place for in-house personnel to support the recommendations made in the comprehensive survey (i.e. maintenance of ventilation system, guards)?	1	
TOTAL POINTS	7	

Each worksite should perform a safety and health inspection on a regular basis. Employees at the worksite can be trained to perform these inspections. The goal of performing this inspection will be to identify any controls that might have slipped since the routine analysis was performed.

DO:

- **Develop an inspection program and assign responsibility.**
- **Train in-house safety inspectors and supervisors in hazard identification.**
- **Require written reports of inspections.**
- **Follow up to ensure correction of items identified by in-house inspectors.**
- **Develop interim protections as a temporary hazard correction.**

Regular Site Safety and Health Inspections

KEY QUESTIONS	Maximum Points	Assigned Points
Are in plant safety/health inspections conducted on a regular, scheduled basis?	1	
Is an inspection checklist specific to your operation used in inspections?	1	
Are inspection results listed in a report and follow-up procedures in use?	1	
Are inspectors given training in hazard identification?	1	
Are inspectors given responsibility and authority to correct deficiencies?	1	
TOTAL POINTS	5	

The goal of any safety and health program is to identify and correct hazards before they become a problem and employees are harmed. The employer should use all employees as hazard lookouts. The name of the game is accident and illness prevention, and it should start with each person who enters the job site. To be effective, employees need to know whom to notify and how, fear no reprisal.

Employees will also need to see timely response to their reports. These responses are visible evidence of management's commitment to worker safety and health and your desire for meaningful employee involvement.

DO:

- **Develop a safety observation and reporting system to provide a way for employees to notify you of conditions or practices they think are hazardous.**
- **Ensure that all new employees are aware of how to report unsafe conditions and what actions should be taken while the hazard is being corrected.**
- **Develop a tracking procedure that requires final disposition of recommendations or hazards reported.**
- **Develop a response system to ensure that employees are informed of decisions; this will increase employee's confidence that you are serious about safety and health.**

Employee Reports of Hazards

KEY QUESTIONS	Maximum Points	Assigned Points
Is there an in-house procedure for handling safety and health complaints and providing information to employees?	1	
Are new employees told who to contact and what to do if they see something they think is hazardous?	1	
Are in-house safety violations promptly corrected?	1	
Are employees given a response to their suggestions?	1	
Do employees feel that they can report safety hazards without being disciplined or harassed?	1	
TOTAL POINTS	5	

Unfortunately accidents can happen. Accidents must be investigated and analyzed in a timely manner while the facts are still fresh and allows for accident reenactment. Prompt investigation also indicates managements concern.

Employers should use accidents as learning tools by investigating them to determine the causes and then developing ways to avoid similar situations in the future. Every accident has a cause. Once you determine what caused the accident, you can take steps to keep it from happening again and minimize time loss. The emphasis for accident investigation should be on fact-finding, not fault finding.

Because the immediate supervisor is usually first on the scene, the supervisor should be trained in accident investigation. The investigation should determine:

1. Exactly what happened and where;
2. Under what circumstances the accident occurred; and
3. What should be done to prevent the circumstances which caused the accident

DO:

- Develop an accident investigation procedure.
- Train supervisors in accident investigation techniques.
- Require that all accidents be investigated, the cause determined and corrective action taken within 24 hours of the accident.
- Insist upon fact-finding, not fault finding.
- Take constructive steps to eliminate or control the hazard that caused the accident.
- Ensure that employees understand that hazardous conditions and unsafe acts will not be tolerated.

Accident/Incident Reports

KEY QUESTIONS	Maximum Points	Assigned Points
Are all required reports maintained as applicable?	1	
Do supervisors investigate accidents and write up a report?	1	
Are accident investigation techniques designed to find the cause, not the fault?	1	
Do written reports show what preventative/corrective action is to be taken to prevent similar accidents?	1	
Are investigators trained?	1	
Has an accident investigation procedure been established?	1	
Is an investigation required for all injury/illnesses even if only a first aid case?	1	
Is an investigation required for all "incidents" (accident resulting in no injury and property damage)?	1	
Is the record keeping responsibility assigned and record keeping implemented?	1	
Is there a procedure for assuring remedial actions and follow-up of these actions as recommended in the investigative reports carried out?	1	
TOTAL POINTS	10	

A good record keeping system can help management by providing them with the means to objectively evaluate the magnitude of his accident problems.

Tracking injuries and illnesses over periods of time can be useful information in devising a prevention plan. They can help you discover trends such as an increase in the number or severity of accidents, or an increase in a certain kind of accident, or an increase of accidents in a certain department. They may also point out problem areas that are missed by simple inspections.

DO:

- **Develop a system for reporting incidents involving no injury, near-miss accidents and first aid cases.**
- **Assign responsibility for maintaining records (200 Logs and other accident/incident forms) to one individual.**
- **Analyze accident records (200 logs, first aid cases, no injury reports) on an annual basis to identify trends or for common underlying or primary cause factors.**

Injury and Illness Trend Analysis

KEY QUESTIONS	Maximum Points	Assigned Points
Are medical records being completed and reviewed (200 Logs, first aid reports, incident reports)?	1	
Are accident-repeater jobs identified and analyzed to develop safer methods (i.e. organization as a whole; by department; by occupation; by injury type; by body part)?	1	
Is corrective action implemented to reverse the trends identified?	1	
TOTAL POINTS	3	

Controls

Hazard Prevention and Control

Controls

- **Appropriate**
- **Maintenance**
- **Emergency Plans**
- **Emergency Treatment**

Once a list of hazards and potential hazards for the workplace has been produced, the prevention and control program can be designed. The program should consist of the following:

- Appropriate Controls - all controls in place.**
- A preventative maintenance program established and working.**
- An emergency action plan established and all employees know how to respond.**
- A program is in place to render emergency treatment.**

When designing the prevention and control program, apply controls following this ranking: engineering; controls; work practices; personal protective equipment; and administrative controls. A further explanation follows:

1. **Engineering to eliminate the hazard by substitution or by removing the hazard from the method, material, structure or process. It's the most effective way of ensuring employees' health and safety. In most situations, OSHA requires that an employer implement feasible engineering controls for both safety and health concerns before relying on guarding, safe work practices, personal protective equipment or administrative controls.**
2. **Controlling hazard by enclosing or guarding at its source. All machines and equipment should be guarded for pinch points, catch points, shear points, squeeze points, flying objects or sparks, sharp and pointed objects, hot and cold objects.**
3. **Using work rules and work practices to train personnel to be aware of the hazard and to follow safe job procedures to avoid it. Employees must be trained to understand why these rules and work practices are necessary and how they can be used to protect themselves and others.**
4. **Providing and requiring the use of personal protective equipment to shield them against the hazard. Employees must be trained and be knowledgeable on the selection, use, limitation and care of all personal protective equipment. Before an employer can rely on the use of personal protective equipment, engineering controls must be used where feasible to reduce exposure to the lowest extent possible.**
5. **Using administrative controls to limit the time/duration of the exposure.**

Administrative controls are only effective in certain cases and the control must not expose more employees to undesirable environments of toxic and injurious materials.

Of course the ideal situation would be to eliminate hazards or exposures that employees would encounter. Since this is not always possible, employers should use the best available methods for protecting employees. Engineering controls combined with good work practices can, for the most part, provide maximum protection for employees. The employer is responsible for providing whatever training is necessary to ensure that their employees know how to use the systems in place for protection.

DO:

- **Get familiar with OSHA requirements.**
- **Apply controls using the ranking method, i.e., engineering; safeguarding; work rules and safe work practices; personal protective equipment; administrative.**
- **Develop general safety and health work rules and communicate them clearly and frequently to your employees.**
- **Solicit your employees input when developing your plant safety rules and regulations.**
- **Post work rules and regulations in the workplace.**

- **Review rules periodically to ensure that they are kept current with existing practices.**
- **Develop procedures for enforcing safety and health rules and safe work practices to ensure that employees do not neglect them.**

Appropriate Controls

KEY QUESTIONS	Maximum Points	Assigned Points
Do you have written general safety and health rules, which all employees understand?	1	
Are the general rules posted in places that reinforce their message and purpose?	1	
Have jobs been analyzed to identify and evaluate the potential injury and illness hazards?	1	
Have controls been established for all identified potential hazards?	1	
Is there a current inventory of all potentially hazardous chemicals and other substances to identify exposures?	1	
Have one or more methods of machine guarding been provided to protect employees from hazards such as those created by point of operation, ingoing nip points, rotating parts, flying chips and sparks?	1	
Is management knowledgeable in the inherent limitations, selection, use, care and maintenance of PPE?	1	
Are employees properly instructed in the correct use and care of PPE?	1	
Are engineering controls used before resorting to the use of PPE?	1	
Is PPE made available to employees and in good working order?	1	
TOTAL POINTS	10	

Provide a good equipment maintenance program that will keep the in-place engineering controls operating as efficiently as possible. Check items such as ventilation systems to make sure it maintains the correct airflow. Check electronic or electrical controls to see that they work. Check guards and guarding devices to see that they are in place, are being used and are effective. When equipment is not maintained properly, it can become hazardous. Maintain good housekeeping as it eliminates clutter, which can cause trips, slips and falls or contribute to fires; promotes efficient use of space; reduces operating energy requirements; and promotes good morale.

DO:

- **Establish an equipment maintenance program so that engineering controls function properly and hazardous breakdowns can be prevented.**
- **Survey and list all processes, machines and portable power tools available.**
- **Audit all maintenance records for the machines you have. Determine if manufacturers manuals exist, if they are adequate and whether they are being followed.**
- **Develop a tracking procedure that lists the status of each tool or machine or process, its location and relevant inspection data.**
- **Clearly define inspection criteria, appropriate schedules for maintenance and inspections.**
- **Clearly define organizational responsibility for inspections.**

Preventative Maintenance

KEY QUESTIONS	Maximum Points	Assigned Points
Are machines well maintained?	1	
Are engineering control measures routinely tested, maintained and upgraded?	1	
Is there a written preventative maintenance program developed with clearly defined organizational responsibility for inspections?	1	
Is there consistent documentation of inspections and complete history files for all equipment?	1	
Are portable powered tools included as part of the preventative maintenance program?	1	
Is good housekeeping evident?	1	
Do manufacturers' manuals exist for your equipment, are they adequate and are they being followed?	1	
Do maintenance records exist for the machines you have?	1	
Are there clearly defined inspection criteria?	1	
Is there a tracking system that lists the status of each tool, its location, relevant inspection data and all appropriate recall information?	1	
Are maintenance personnel well trained?	1	
TOTAL POINTS	11	

No safety and health program is complete without a plan for emergencies. Survey for all possible emergency situations (fire, natural disasters, human errors such as toxic spills). Just because something has never happened, does not mean it won't. Plan for the emergency to determine who is supposed to do what. Train and educate so that the responses needed at times of crisis can become practically automatic. The greater the possibility of an emergency, the more preparation should be done. Each employee should be trained in the emergency procedures of the workplace. For those who have special responsibilities during emergencies, additional training should be provided that will allow them to safely perform their duties. Working training drills into the activities of the workplace will better prepare everyone should an emergency arise. All should know immediately how to respond, through planning, training and drills.

DO:

- Identify all possible emergency situations such as those created by work processes, natural disasters, fires, and human error.
- Develop a plan for responding to each type of emergency identified.
- Train employees and conduct a drill on emergency actions to ensure that all know immediately what to do when an emergency arises.
- Post emergency telephone numbers, emergency exit routes.
- Insure that new employees are aware of your emergency response procedures.
- Periodically review emergency planning in meetings.

Emergency Preparation

KEY QUESTIONS	Maximum Points	Assigned Points
Is there a written emergency action plan (EAP)?	1	
Are there diagrams posted showing exits, fire extinguisher locations, egress routes, telephone numbers?	1	
Is the EAP posted with employee's awareness of the plan?	1	
Are drills and/or training provided on a regular basis?	1	
Is the EAP updated on a regular basis?	1	
Is there a procedure for assembling evacuated personnel?	1	
Are there provisions for handling chemical spills?	1	
TOTAL POINTS	7	

A medical program consists of prevention, early recognition and treatment, and limiting the severity of injuries and illnesses. This means that you need to provide basic health care services onsite. It does not mean establishing a large department of doctors and nurses. Instead, most facilities have employees within their site that can provide basic health care should an emergency situation arise. Employers should look for occupational health providers when putting together the health and safety program. For small companies, the employer can arrange for health care through local clinics. The key to the medical program is to minimize the time an injured person will have to wait before being properly treated. Training employees onsite in first aid and CPR provides companies with a source of help during times of trouble.

DO:

- **Contract with occupational health professionals to provide for emergency medical treatment for employees.**
- **Arrange for industrial hygiene surveys or ergonomic studies if conditions indicate they are necessary.**
- **Train employees in first aid/CPR (at least 2 persons per shift).**
- **Establish procedures for handling emergency medical situations to reduce the likelihood of panic and to result in faster and more efficient emergency care.**

Medical Program

KEY QUESTIONS	Maximum Points	Assigned Points
Is there an alarm and other communication system?	1	
Is there at least two people trained and certified in first aid and CPR on each shift?	1	
Is individual training completely documented and is retraining conducted prior to certification expiration?	1	
Is there adequate first aid and medical equipment available onsite that is appropriate to the specific hazards located near workstations?	1	
Are the medical emergency phone numbers prominently posted?	1	
Has environmental monitoring (noise, dust, mist, fume) been completed?	1	
Do you have access to a medical treatment facility within close proximity (i.e., 5 minutes or less)?	1	
Are procedures established for handling injured/ill personnel?	1	
Is a list of medical emergency response individuals posted?	1	
Are cases that cannot be handled onsite promptly dispatched to the appropriate medical provided with proper documentation?	1	
Are written emergency procedures developed and communicated to personnel?	1	
Are eyewash/showers provided in work areas for immediately emergency use?	1	
TOTAL POINTS	12	

TRAINING

Safety and Health Training

TRAINING

- Employees
- Supervisors
- Managers

For an effective safety and health program, it is crucial that everyone at the workplace understand his/her role in the program, actively work to prevent and/or control hazards and potential hazards at the worksite, and the ways they should protect themselves should a hazard occur. A good safety and health program is achievable if the following understand their roles and responsibilities within their group:

- Employees are trained to understand the hazards of their jobs and how to protect themselves.
- Supervisors understand their safety responsibilities; understand how to reinforce and enforce employee training.
- Managers understand their own responsibilities regarding training.

For an effective safety and health program, it is crucial that everyone at the workplace understand his/her role in the program, actively work to prevent and/or control hazards and potential hazards at the worksite, and the ways they should protect themselves should a hazard occur. A good safety and health program is achievable if everyone understands their roles and responsibilities within their group.

Employees

Each employee should understand how important they are to the overall picture of safety and health, not only for their well-being, but for every worker involved. Training is especially important for new employees. However, periodic retraining of all employees is also essential. The employees need to know the general safety and health rules, specific site hazards and the safe work practices that are used to control exposure, and the role they are to play in an emergency situation.

Supervisors

Supervisors should be given training both in the safety and health area and in the leadership area. The supervisor needs to be tuned in to the worksite and the potentials for hazards occurring in their areas. Supervisors need special training in the maintenance of their areas, as well as how to get their employees involved in hazards control.

Managers

It is necessary for the manager to have a good system of communication to the workers who are in his or her department. The manager must also understand what his or her role in the safety and health program is, and set the leadership example for others to follow. The employer should do whatever it takes to help raise the level of awareness of the managers at the worksite and offsite.

DO:

- Identify training needs and objectives specific to your company.
- Involve employees in identifying training needs and when possible use them as trainers.
- Create a safety bulletin board as an aid in training and charge an employee with responsibility for its maintenance.
- Establish a training budget.
- Provide training for supervisory and managerial personnel (i.e. leadership, hazard identification, accident investigation, training methods).
- Establish an orientation program for new hires. At a minimum, employees must know the general safety and health rules, specific site hazards and the safe work practices needed to help control exposure, and the individual's role in all types of emergency situations.
- Evaluate training on a regular basis.
- Establish and maintain training records.

General Training - Employee, Supervisory, Managerial

KEY QUESTIONS	Maximum Points	Assigned Points
Has an inventory been made of all jobs to determine those with high loss potential requiring special training?	1	
Are training needs assessed routinely and provided for in the budget?	1	
Are employees involved in training (identifying needs as well as actual trainers)?	1	
Are training responsibilities assigned?	1	
Does the training provide understanding and knowledge of the hazards of the task(s) to be performed?	1	
Does the training program provide training for new hires and for retraining of present employees?	1	
Are trainers knowledgeable on the subject matter and in training methods?	1	
Are training records maintained?	1	
TOTAL POINTS	8	

Employee Training

KEY QUESTIONS	Maximum Points	Assigned Points
Is there a training or orientation program for new hires?	1	
Are employees instructed in how and when to report injuries, including instructions as to the location of first aid facilities?	1	
Are employees instructed in how to report unsafe conditions and practices?	1	
Are employees instructed in the need for, use and care of required personal protective equipment?	1	
Are employees instructed in the proper actions to take in the event of emergencies, including exit routes from areas during emergencies?	1	
Are employees instructed in hazardous gases, chemicals or materials involved with the job, along with instructions on the safe use and action to be taken following accidental exposure?	1	
Are employees given an on-the job review of the practices necessary to perform the job in a safe manner?	1	
TOTAL POINTS	7	

Supervisory and Managerial Training

KEY QUESTIONS	Maximum Points	Assigned Points
Is there an orientation program for new management members regarding your safety and health program?	1	
Are supervisors and management personnel given initial training in safety and health?	1	
Are supervisory and managerial personnel provided training in their leadership roles?	1	
Are supervisory and managerial personnel provided instruction in training methods?	1	
Is a portion of each safety meeting devoted to safety instructions?	1	
TOTAL POINTS	5	

EVALUATION

EVALUATION OF SAFETY AND HEALTH MANAGEMENT PROGRAM

Total the scores for each sub element and list them in the space provided. The area remaining shaded is your opportunity for improvement. Carry your totals to the Final Assessment Worksheet and evaluate your program.

**MANAGEMENT LEADERSHIP
& EMPLOYEE INVOLVEMENT**

Policy	
Goal & Objectives	
Responsibility	
Visible Management Leadership	
Employee Involvement	
Authority & Resources	
Accountability	
Program Evaluation	
TOTALS	

WORKSITE ANALYSIS

Comprehensive Hazard Identification	
Site Safety & Health Inspections	
Employee Hazard Reports	
Accident & Incident Reports	
Trend Analysis	
TOTALS	

HAZARD PREVENTION & CONTROL

Appropriate Controls	
Preventive Maintenance	
Emergency Preparation	
Medical Program	
TOTALS	

TRAINING

General Training	
Employee Training	
Supervisory & Management Training	
TOTALS	

FINAL ASSESSMENT WORKSHEET EVALUATION OF SAFETY AND HEALTH MANAGEMENT PROGRAM

COMPANY _____

BY _____ DATE _____

Total the scores for each major element and list them below. The maximum possible score for each major element is listed in parenthesis.

SAFETY & HEALTH MANAGE PROGRAM ASSESSMENT

Management Leadership & Employee Involvement (44)	
Worksite Analysis (30)	
Hazard Prevention & Control (40)	
Safety & Health Training (20)	
TOTALS (134)	

80% OR BETTER (107-134 points):

You may be ready to participate in one of OSHA's safety and health achievement recognition programs. If you have more than 500 employees, contact the OSHA Regional Office and ask about the Voluntary Protection Program (VPP). If you have less than 500 employees, contact your local Onsite Consultation Program and ask about the Safety and Health Achievement Recognition Program (SHARP). In Illinois, call 1-800/972-4216. For any other location and telephone numbers are listed on the OSHA Website at www.OSHA.gov

LESS THAN 80% (0-106 points):

Consider implementing a safety and health management program to reverse accident trends. Concentrate your efforts on developing and carrying out the missing program elements. Use the Action Plan Worksheet, which follows as an aid in identifying and tracking objectives. If you need assistance, contact your local Onsite Consultation Program.

ACTION PLAN WORKSHEET

Use the Action Plan Worksheet to identify specific activities, which will allow you to reach your goal of having a safe and healthful workplace. Use the worksheet to set up an action plan and track progress. Copy the worksheet as needed.

- Identify program areas where elements are missing or defective.
- Determine where you want to be.
- Identify objectives, which will help you reach your goal.
- Divide objectives into specific activities.
- Assign responsibility to one individual who will be held accountable for the activity.
- Assign target dates to each activity for evaluation purposes.

ACTION PLAN WORKSHEET

GOAL: _____

OBJECTIVE: _____

ACTIVITY	PERSON IN CHARGE	DUE DATE
1. _____ _____ _____ _____		
2. _____ _____ _____ _____		
3. _____ _____ _____ _____		
4. _____ _____ _____ _____		
5. _____ _____ _____ _____		
6. _____ _____ _____ _____		