Introduction

Managing Safety and Health
• Time: About two hours,
• Objectives:
• 1: Explain the importance of an effective health & safety program
• 2: Explain worker rights to a safe & healthful workplace
• 3: Discuss employers responsibilities to provide a safe & healthful workplace
• 4: Understand the critical role the supervisor has on the success of a safety & health program
• 5: Discuss the key elements of an effective safety & health program in preventing injuries and incidents
Introduction

Module Objective

– Basic guidelines (requirements in some states) recommended by the Federal Occupational Safety and Health Administration (OSHA) with respect to injury and illness prevention programs.
– The module should take about 20 minutes
– Intended for Workers, Supervisors and Managers
– Click on the link to view OSHA’s website for additional OSHA related information.

LINK: www.osha.gov
Background

- Over the past 30 years ...
  - The occupational safety and health community has used various names to describe systematic approaches to reducing injuries and illnesses in the workplace.
  - OSHA has voluntary Safety and Health Management Program guidelines. Consensus and international standards use the term "Safety and Health Management Systems," and many of OSHA's state plan states use terms such as "Injury and Illness Prevention Programs" and "Accident Prevention Programs."
Introduction

Background

• OSHA most recently uses the term "Injury and Illness Prevention Programs."
  – Regardless of the title, the common goal of these approaches is to help employers reduce workplace injuries and illnesses through a systematic process that proactively addresses workplace safety and health hazards.

TIP: Injury and Illness Prevention Programs are often referred to as IIPP or I2P2.
OSHA’s Safety Programs History

- OSHA has long recognized ....
  - The implementation of a safety and health program as a way of demonstrating good faith by an employer in promoting workplace safety and health.
  - Over the years, OSHA has established a number of initiatives to encourage employers to develop and implement employee safety and health programs.
Introduction

OSHA’s Safety Programs History

• OSHA’s guidance ...
  – Reflect the best management practices of successful companies and encourage employers to institute and maintain a program which provides systematic policies, procedures, and practices that are adequate to recognize and protect their employees from occupational safety and health hazards.
  – The original four major elements of an effective program:
    • Management commitment and employee involvement;
    • Worksite analysis;
    • Hazard prevention and controls; and
    • Safety and health training.
Introduction

OSHA’s IIPP Proposed Rule

• Elements:
  – 1. Management duties
  – 2. Employee participation
  – 3. Hazard identification and assessment
  – 4. Hazard prevention and control
  – 5. Education and training
  – 6. Program evaluation

TIP: Federal OSHA refers to their proposed Injury and Illness Prevention Program rule as I2P2.
OSHA’s IIPP Proposed Rule

- These elements are similar to ...
  - IIPP requirements as specified, adopted and enforced already already by some states.
  - Cal/OSHA has had an IIPP regulation since 1991.
  - As of 2011, fifteen states have IIPP type requirements.
  - OSHA has learned much from the variety of approaches taken by these 15 states.
Where to Find

- Regulation elements of IIPP:
  - Contact your state’s OSHA Consultation Service and inquire on your states IIPP type programs requirements.
  - You can contact your state’s OSHA Consultation Service by clicking on the link shown and using the drop down menu to locate your state.

LINK: http://www.osha.gov/dcsp/smallbusiness/consult_directory.html
IIPP Elements

Elements of effective IIPPs

- IIPP program should:
  - Be in writing.
  - Be maintained at the fixed work site.
  - Begin with policy statement.
  - Specifically address responsible persons, employee compliance, employee communications, hazard assessment, accident investigation, hazard control, training / instruction and recordkeeping.
  - Be reviewed periodically and updated.
IIPP Elements

Who’s Covered?

• The IIPP should cover ...

  – the employers employees and all other workers who the employer controls or directs and directly supervises on the job to the extent these workers are exposed to work site and job assignment specific hazards.
IIPP Elements

Responsible Person

– Responsible Person

• It is important for the employer to identify in the IIPP the “person or persons with “authority and responsibility” for implementing the IIPP”.

• Person or persons should be documented in writing.

• Everyone within the organization should know who this person or persons are.
IIPP Elements

Responsible Person

– The Responsible Person should:
  • Be committed to safety and health.
  • Have time, authority and resources to develop program.
  • Be someone who wants the responsibility.
    – NOT be an appointee with little or no interest in occupational safety and health.
  • The Responsible Person should have adequate training and qualification.

**TIP**: Many employers encourage and provide their Responsible Person with safety certifications such as those offered by the Board of Certified Safety Professionals. Link: http://www.bcsp.org/
IIPP Elements

Responsible Person

• Managers and supervisors are responsible ...
  – For implementing and maintaining the IIPP in their work areas and for answering worker questions about the IIPP.
  – Managers and supervisors should be thoroughly trained and informed on elements of the IIPP.
  – IIPP Program should be readily available to them.
Employee Compliance

• The second major IIPP element:
  – Include a system for ensuring that employees comply with safe and healthy work practices.
Employee Compliance

- Elements include:
  - Recognition of employees
  - Training and retraining programs
  - Disciplinary actions
  - Other means that ensures employee compliance, for example:
    - Safe employee of the month.
    - Giving a cash bonus
    - Giving a special jacket or similar acknowledgement.

**TIP:** All permanent and intermittent workers, including managers and supervisors, are responsible for complying with safe and healthful work practices.
IIPP Elements

Employee Compliance

• Incentives and Awards
  – Some employers have implemented:
    • An incentive program, or safety bulletins, or similar that:
      – Recognizes employees, groups, teams or departments for effective safety.

**TIP:** Employee compliance should include evaluating the safety performance of all workers.
Employee Compliance

• Unsafe Behavior
  – Employee Compliance includes:
    • Procedures to address unsafe behavior.
    • Example:
      – 1st non-serious infraction: verbal warning
      – 2d non-serious infraction: written warning
      – 3d non-serious infraction: 1 suspension without pay.
      – 4th non-serious infraction: termination.

  – Important that employers work with their Human Resources
  – and/or legal specialists to develop a disciplinary action program.

**TIP:** Providing training or retraining to workers whose safety performance is deficient should be considered by employers.
Employee Communications

• The third major element of an effective IIPP:
  • “Include a system for communicating with employees in a form readily understandable by all affected employees on matters relative to occupational safety and health, including provisions designed to encourage employees to inform the employer of hazards at the worksite without fear of reprisal”.

**TIP:** When lives or health is at stake, employee fear of reprisal over reporting an unsafe or unhealthy condition or behavior is totally unacceptable.
IIPP Elements

Employee Communications
– Elements include:
  • New worker orientation
  • Meetings
  • Training programs
    – (including translation where appropriate)
  • Posting
  • Written communications
  • Anonymous notification
  • Labor/management committees, other means.

**TIP:** It is important that upon hiring, management identify any intermittent workers with special communication needs. Management should ensure that such a worker understands the safety and health requirements before being assigned to duties exposing them to workplace hazards. Failure to do so could result in serious and potentially fatal injury and illness.
Employee Communications

– Labor/management safety and health committees should have clear guidance involving:

• Frequency of meetings.
• Written records.
• Review of inspections, investigations, and conditions.
• Evaluation of employee safety suggestions.
Employee Communications

• Safety Meetings / Tailgate and/or Toolbox meetings

  – Can be a great way to provide safety and health communications to employees in the construction and other types of industries.
  – Required by some states, these periodic meetings should include the discussion of planned work and safety issues, safety problems and accidents that have occurred.

**TIP:** Daily and post incident toolbox or tailgate meetings are recommended as they have shown to be very effective in communicating safe work practices and reinforcing the need for safety on the jobsite.
Hazard Assessment

• The fourth major element of the IIPP:
  – “Include procedures for identifying and evaluating workplace hazards, including scheduled periodic inspections to identify unsafe conditions and work practices.”

TIP: Periodic inspections consist of identification and evaluation of workplace hazards utilizing applicable sections of the IIPP, any site safety plans, activity hazard analysis, applicable OSHA regulations or other checklists developed by the employer.
IIPP Elements

Hazard Assessment

– Assessment or inspection should be done when:
  • IIPP is first established.
  • New substances, processes, procedures, or equipment are introduced to the workplace that represent a new occupational safety and health hazard; and
  • New or previously unrecognized hazards uncovered.

TIP: A safety evaluation should be conducted whenever workplace conditions warrant an inspection.
IIPP Elements

Injury and Illness Investigation

• The fifth major element of an effective IIPP:
  • “Include a procedure to investigate occupational injury or illness.”
  • Investigate near miss and property damage events.
  • Investigations important to uncover root causes to prevent accident or incident reoccurrence.
IIPP Elements

The Investigation Process

• Procedures for investigating workplace accidents include:
  – Visiting the accident scenes.
  – Interviewing injured workers and witnesses.
  – Examining the workplace.
  – Determining the cause.
  – Taking corrective action.
  – Recording the findings and corrective actions.
  – Notifying OSHA of serious injury or death.
Hazard Control

• The sixth major element of an effective IIPP:
  – “Include methods and/or procedures for correcting unsafe or unhealthy conditions work practices, and work procedures in a timely manner based on the severity of the hazard”.
Hazard Control

- Hazards should be controlled:
  - When observed or discovered.
  - When an imminent hazard exists, remove all unnecessary personnel.
  - Employees necessary to correct the hazardous condition must be provided necessary safeguards.
Hierarchy of Controls:

- Main ways to control a hazard:
  - Elimination (including substitution)
  - Engineering Controls: (e.g. designs or modifications, ventilation systems, processes)
  - Administrative / Work Practice Controls: (e.g. controls to alter way work is performed, timing of work, policies and procedures, and work practices)
  - PPE: to reduce exposure such as contact with chemicals or exposure to noise.

**TIP:** These methods are also known as the "hierarchy of control" because they should be considered in the order presented (it is always best to try to eliminate the hazard first, followed by administrative or work practices controls followed by the last line of defense, Personal Protective Equipment.)
Training and Instruction

• The seventh major element...
  – “Provide training and instruction.”
  • Training can change:
    – Behavior
    – Attitudes
    – Work habits
IIPP Elements

Training and Instruction

• Training should be provided:
  – When program first established
  – To new employees
  – To employees given new job assignments
  – Whenever new substances, processes, procedures, or equipment are introduced
  – Whenever employer is made aware of a new or previously unrecognized hazard.
Training Topics

• Explanation of the employer's IIPP, emergency action plan and fire prevention plan, and measures for reporting any unsafe conditions, work practices, injuries and when additional instruction is needed;
• Use of appropriate clothing, including gloves, footwear, and personal protective equipment;
• Prevention of musculoskeletal disorders, including proper lifting techniques;
• Information about chemical hazards to which workers could be exposed and other hazard communication program information;
• Availability of toilet, hand-washing and drinking water facilities;
• Provisions for medical services and first aid including emergency procedures.
Training and Instruction

- Supervisors should receive:
  - Specific training to familiarize them with safety and health hazards to which employees under their immediate direction and control may be exposed.
Records

• Documenting activities.
  – Keep records of:
    – Steps taken to establish and maintain the IIPP, including records of the scheduled and periodic inspections to identify hazardous conditions and work practices.
    – Safety and health training given to employees.
    – Records should be kept for at least one year.
    – Know your states recordkeeping requirements.

**TIP:** Although some state OSHA programs have specified 1 year to maintain records, the employer may reconsider this and check with their legal counsel as many OSHA attorneys recommend that these records be maintained for considerably longer periods of time to document the employees IIPP efforts.
Documentation

Records

– Inspection Records document:
  • Scheduled and periodic inspections.
  • Dates and locations.
  • Person conducting the inspection.
  • Unsafe conditions and work practices identified.
  • Corrective actions.
Records

• **Training Documentation**
  – Training documents should include:
    • Employee name
    • Training dates
    • Types of training
    • Training topics, and
    • Training providers
Conclusion

Assistance Programs

• OSHA:
  – Consultation assistance.
  – Training and education.
  – Voluntary protection type programs.

LINK: http://www.osha.gov/dcsp/smallbusiness/consult.html
Conclusion

IIPP Summary
• Injury and Illness Prevention Program elements:
  – Written and effective safety and health program.
  – Responsible Person(s)
  – Employee Compliance
  – Safety and Health Communications
  – Identify and Evaluate Workplace Hazards
  – Accident Investigation
  – Controls Workplace Hazards
  – Training Program
  – Record keeping