

## **Developing a Profitable Strategy for Handling Occupational Safety and Health**

Many people confuse the idea of “accidents” with the notion of Acts of God. The difference is clear. Floods and tornadoes cannot be prevented by the owner or manager of a small business, but workplace accidents can be prevented, and indeed, floods and tornadoes can be anticipated and prepared for.

Nobody wants accidents to happen in his or her business.

A serious fire or the death of an employee or an owner can cause the loss of a great amount of profit or, in some cases, even an entire business. To prevent such losses, you don't have to turn your place upside down. You may not have to spend a lot of money, either. You may only need to use good business sense and to apply recognized prevention principles.

There are reasons why accidents happen. Something goes wrong somewhere. It may take some thought, and maybe the help of friends or other trained people, to figure out what went wrong, but there will be a cause—a reason why. Once you know the cause, it is possible to prevent an accident. You need some basic facts, and perhaps some help from others who know some of the answers already. You also need a plan—a plan for preventing accidents.

Not all danger at your worksite depends on an accident to cause harm, of course. Worker exposure to toxic chemicals or harmful levels of noise or radiation may happen in conjunction with routine work as well as by accident. You may not realize the extent of the exposure on the part of you and/or your employees, or of the harm that may result. The effect may not appear immediately, but it may be fatal in the long run. You need a plan that includes prevention of these “health hazard exposures” as well as accidents. You need a *safety and health protection plan*.

It is not a difficult task to develop such a plan. Basically, you only need to concern yourself with those types of accidents and health hazard exposures which *could* happen in your workplace.

Because each workplace is different, your program may be different from one that your neighbor or your competitor might use. But this is not important. You want it to reflect *your* way of doing business, not theirs.

While the details may vary, there are four basic elements that are always found in workplaces with a good accident prevention program. These are as follows:

1. The manager or management team leads the way, especially by setting policy, assigning and supporting responsibility, setting an example, and involving employees.

2. The worksite is continually analyzed to identify all hazards and potential hazards.

3. Methods for preventing or controlling existing or potential hazards are put in place and maintained.

4. Managers, supervisors, and employees are trained to understand and deal with worksite hazards.

Regardless of the size of your business, you should use each of these elements to prevent workplace accidents and possible injuries and illnesses.

*The key to the success of this plan is to see it as a part of your business operation and to see it reflected in all your work.* As you continue doing it, the program becomes easier. It becomes built-in and then you need only check on it periodically to be sure everything's working well.

### ***Management Commitment and Employee Involvement***

As the owner or manager of a small business, your attitude towards job safety and health will be reflected by your employees. If you are not interested in preventing employee injury and illness, nobody else is likely to be.

At all times, demonstrate your personal concern for employee safety and health and the priority you place on them in your workplace. Your policy must be clearly set. Only you can show its importance through your own actions.

Demonstrate to your employees the depth of your commitment by involving them in planning and carrying out your efforts. If you seriously involve your employees in identifying and resolving safety and health problems, they will commit their unique insights and energy to helping achieve the goal and objectives of your program.

## **II. A FOUR-POINT WORKPLACE PROGRAM**

Consider forming a joint employee-management safety committee. This can assist you in starting a program and will help maintain interest in the program once it is operating. Committees can be an excellent way of communicating safety and health information. If you have few employees, consider rotating them so that all can have an active part in the safety and health programming.

The men and women who work for you are among the most valuable assets you have. Their safety, health, and goodwill are essential to the success of your business. Having them cooperate with you in protecting their safety and health not only helps to keep them healthy—it makes your job easier.

As a small business employer, you have inherent advantages, such as close contact with your employees, a specific acquaintance with the problems of the whole

business, and usually a low worker turnover. Probably you have already developed a personal relationship of loyalty and cooperation that can be built upon very easily. These advantages may not only increase your concern for your employees but also may make it easier to get their help.

Here are some actions to take:

- Post your own policy on the importance of worker safety and health next to the OSHA workplace poster where all employees can see it. (See sample policy statements in Appendix B.)
- Hold a meeting with all your employees to communicate that policy to them and to discuss your objectives for safety and health for the rest of the year. (These objectives will result from the decisions you make about changes you think are needed after you finish reading this publication.)
- Make sure that support from the top is visible by taking an active part, personally, in the activities that are part of your safety and health program. For example, personally review all inspection and accident reports to ensure followup when needed.
- Ensure that you, your managers, and supervisors follow all safety requirements that employees must follow, even if you are only in their area briefly. If, for instance, you require a hard hat, safety glasses and/or safety shoes in an area, wear them yourself when you are in that area.

Use your employees' special knowledge and help them buy into the program by having them make inspections, put on safety training, or help investigate accidents.

- Make clear assignments of responsibility for every part of the program that you develop. Make certain everyone understands them. The more people involved the better. A good rule of thumb is to assign safety and health responsibilities in the same way you assign production responsibilities. Make it a special part of everyone's job to operate safely. That way, as you grow and delegate production responsibilities more widely, you will commit safety and health responsibilities with them.
- Give those with responsibility enough people, on-the-clock time, training, money and authority to get the job done.
- Don't forget about it after you make assignments; make sure personally that they get the job done. Recognize and reward those who do well, and correct those who don't.
- Take time, at least annually, to review what you have accomplished against what you set as your

objectives and decide if you need new objectives or program revisions to get where you want to be.

### **Worksite Analysis**

It is your responsibility to know what you have in your workplace that could hurt your workers. Worksite analysis is a group of processes that helps you make sure that you know what you need to keep your workers safe. You may need help in getting started with these processes. You can call on your state Consultation Program, listed in Appendix E, for this help. Also, OSHA published a booklet entitled *Job Hazard Analysis*. (See **Related Publications** in Section V for ordering information.) Once you get everything set up, you or your employees can do many of them.

Here are some actions to take:

- Request a consultation visit from your state Consultation Program covering both safety and health to get a full survey of the hazards which exist in your workplace and those which could develop. You can also contract for such services from expert private consultants if you prefer.
- Set up a way to get expert help when you make changes, to be sure that the changes are not introducing new hazards into your workplace. Also, find ways to keep current on newly recognized hazards in your industry.
- Make an assignment, maybe to teams that include employees, to look carefully at each job from time to time, taking it apart step-by-step to see if there are any hidden hazards in the equipment or procedures. Some training may be necessary at the start.
- Set up a system of checking to make sure that your hazard controls have not failed and that new hazards have not appeared. This is usually done by routine self-inspections. You can use the checklist in Section IV of this book as a starting point. Add items to it that better fit your situation. Subtract from it those items that do not fit your situation. Your state consultant can probably assist you to establish an effective system.
- Provide a way for your employees to let you or another member of management know when they see things that look harmful to them and encourage them to use it.
- Learn how to do a thorough investigation when things go wrong and someone gets sick or hurt. This will help you find ways to prevent recurrences.
- Initially, take the time to look back over several years of injury or illness experience to identify patterns that can lead to further prevention. Thereafter, periodically look back over several months of

experience to determine if any new patterns are developing.

### ***Hazard Prevention and Control***

Once you know what your hazards and potential hazards are, you are ready to put in place the systems that prevent or control those hazards. Your state consultant can help you do this. Whenever possible, you will want to eliminate those hazards. Sometimes that can be done through substitution of a less toxic material or through engineering controls that can be built in. When you cannot eliminate hazards, systems should be set up to control them.

Here are some actions to take:

- Set up safe work procedures, based on the analysis of the hazards in your employees' jobs (discussed above), and make sure that the employees doing each job understand the procedures and follow them. This may be easier if employees are involved in the analysis that results in those procedures. (See Appendix C - Codes of Safe Practices.)
- Be ready, if necessary, to enforce the rules for safe work procedures by asking your employees to help you set up a disciplinary system that will be fair and understood by everyone.
- Where necessary to protect your employees, provide personal protective equipment (PPE) and be sure your employees know why they need it, how to use it and how to maintain it.
- Provide for regular equipment maintenance to prevent breakdowns that can create hazards.
- Ensure that preventive and regular maintenance are tracked to completion.
- Plan for emergencies, including fire and natural disasters, and drill everyone frequently enough so that if the real thing happens, everyone will know what to do even under stressful conditions.
- Ask your state consultant to help you develop a medical program that fits your worksite and involves nearby doctors and emergency facilities. Invite these medical personnel to visit the plant before emergencies occur and help you plan the best way to avoid injuries and illness during emergency situations.
- You must ensure the ready availability of medical personnel for advice and consultation on matters of employee health. **This does not mean that you must provide health care.** But, if health problems develop in your workplace, you are expected to get medical help to treat them and their causes.

To fulfill the above requirements, consider the following:

- You should have an emergency medical procedure for handling injuries, transporting ill or injured workers and notifying medical facilities with a minimum of confusion. Posting emergency numbers is a good idea.
  - Survey the medical facilities near your place of business and make arrangements for them to handle routine and emergency cases. Cooperative agreements could possibly be made with nearby larger plants that have medical personnel and/or facilities onsite.
  - You should have a procedure for reporting injuries and illnesses that is understood by all employees.
  - Consider performing routine walkthroughs of the worksite to identify hazards and track identified hazards until they are corrected.
  - If your business is remote from medical facilities, you are **required** to ensure that a person or persons be adequately trained and available to render firstaid. Adequate first-aid supplies must be readily available for emergency use. Arrangements for this training can be made through your local Red Cross Chapter, your insurance carrier, your local safety council and others.
  - You should check battery charging stations, maintenance operations, laboratories, heating and ventilating operations and any corrosive materials areas to make sure you have the **required** eye wash facilities and showers.
  - Consider retaining a local doctor or an occupational health nurse on a part-time or as-used basis to advise you in your medical and first-aid planning.
- Training for Employees, Supervisors and Managers***  
 An effective accident prevention program requires proper job performance from everyone in the workplace. As an owner or manager, you must ensure that all employees know about the materials and equipment they work with, what known hazards are in the operation, and how you are controlling the hazards. Each employee needs to know the following:
- No employee is expected to undertake a job until he or she has received job instructions on how to do it properly and has been authorized to perform that job.
  - No employee should undertake a job that appears unsafe.
- with other training that you do, depending upon the kinds of potential and existing hazards that you have. With training, the “proof is in the pudding” in that the result that you want is everyone knowing what they need to know to keep themselves and their fellow

workers safe and healthy.

Here are some actions to take:

- Ask your state consultant to recommend training for your worksite. The consultant may be able to do some of the training while he or she is there.
- Make sure you have trained your employees on every potential hazard that they could be exposed to and how to protect themselves. Then verify that they really understand what you taught them.
- Pay particular attention to your new employees and to old employees who are moving to new jobs. Because they are learning new operations, they are more likely to get hurt.
- Make sure that you train your supervisors to know all the hazards that face the people they supervise and how to reinforce training with quick reminders and refreshers, and with disciplinary action if necessary. Verify that they know what is expected of them.
- Make sure that you and your top management staff understand all of your responsibilities and how to hold subordinate supervisory employees accountable for theirs.

#### **Documenting Your Activities**

Document your activities in all elements of the Four-Point Workplace Program. Essential records, including those legally required for workers' compensation, insurance audits and government inspections **must** be maintained as long as the actual need exists. Keeping records of your activities, such as policy statements, training sessions for management and employees safety and health meetings held, information distributed to employees, and medical arrangements made, is greatly encouraged. Maintaining essential records also will aid:

- (1) the demonstration of sound business management as supporting proof for credit applications, for showing "good faith" in reducing any proposed penalties from OSHA inspections, for insurance audits and others; and
- (2) the efficient review of your current safety and health activities for better control of your operations and to plan improvements.

#### **Safety and Health Recordkeeping**

Records of sales, costs, profits and losses are essential to all successful businesses. They enable the owner or manager to learn from experience and to make corrections for future operations. Records of accidents, related injuries, illnesses and property losses can serve the same purpose, if they are used the same way. The sole purpose of OSHA recordkeeping is to store factual

information about certain accidents that have happened. When the facts have been determined, causes can often be identified, and control procedures can be instituted to prevent a similar occurrence from happening.

### **Injury/Illness Records**

There are injury/illness recordkeeping requirements under OSHA that require a minimum of paperwork. These records will provide you with one measure for evaluating the success of your safety and health activities. Success would generally mean a lack of, or a reduced number of, employee injuries or illnesses during a calendar year.

There are five important steps required by the OSHA recordkeeping system:

1. Obtain a report on every injury requiring medical treatment (other than first aid).
2. Record each injury on the *OSHA Form No. 200* according to the instructions provided.
3. Prepare a supplementary record of occupational injuries and illnesses for recordable cases either on *OSHA Form No. 101* or on workers' compensation reports giving the same information.
4. Every year, prepare the annual summary (*OSHA Form No. 200*); post it no later than February 1, and keep it posted until March 1. (Next to the OSHA workplace poster is a good place to post it.)
5. Retain these records for at least 5 years.

During the year, periodically review the records to see where injuries are occurring. Look for any patterns or repeat situations. These records can help you to identify those high risk areas to which you should direct your immediate attention.

Since the basic OSHA records include only injuries and illnesses, you might consider expanding your own system to include all incidents, including those where no injury or illness resulted, if you think such information would assist you in pinpointing unsafe conditions and/or procedures. Safety councils, insurance carriers and others can assist you in instituting such a system. Injury/illness recordkeeping makes sense, and we recommend this practice to all employers. There are some limited exemptions for small business employers who employ 10 or fewer employees as well as for businesses that have certain SIC codes. Refer to *Title 29 Code of Federal Regulations (CFR) 1904* for the specific exceptions. The employer is required to report, to OSHA, all work-related fatalities and multiple hospitalization accidents with 8 hours of notification of the accident.

Regardless of the number of employees you have or the SIC classification, you may be selected by the Federal

Bureau of Labor Statistics (BLS) or a related state agency for inclusion in an annual sample survey. You will receive a letter directly from the agency with instructions, if you are selected.

**Exposure Records and Others**

The injury/illness records may not be the only records you will need to maintain. Certain OSHA standards that deal with toxic substances and hazardous exposures require records on the exposure of employees, physical examination reports, employment records, etc. As you work on identifying hazards, you will be able to determine whether these requirements apply to your situation on a case-by-case basis. We mention it here so that you will be aware of these records and that, if required, they should be used with your control procedures and with your self-inspection activity. They should not be considered merely as bookkeeping.