Programs, Policies and Procedures: Elements of Effective Safety Programs

Carmen Shafer, CSP, CHST, CRIS
Shafer Safety Solutions, LLC
Ravenswood, WV

Introduction

This paper will provide the reader with a foundational understanding of the elements of an effective safety program, as outlined by the revised ANSI A10.38 Basic Elements of an Employer's Program to Provide a Safe and Healthful Work Environment. Additionally, we will briefly discuss how the other ANSI A10, OSHA and International Standards relate to the development and use of safety programs. Finally, we will consider some lessons learned from existing safety programs that the author has observed in real-world situations, asking and answering how one discards the bad, transforms the ugly, and refines the good to produce and outstanding, self-tailored, company safety program.

Safety Programs, Policies and Procedures

Semantics

Safety programs go by many names in the construction industry including but not limited to: “Injury and Illness Prevention Program” (Federal OSHA, California OSHA), “Safety and Health Program” (Federal OSHA, ANSI A10.38, A10.33, A10.39, and A10.1), “Accident Prevention Program” (Michigan & Washington OSHA), “Health and Safety Plan” (Arkansas Workers Compensation Division), and “Loss Prevention Plan” (Idaho & New York OSHA). Regardless of its nomenclature, a safety program is a tool used by employers in all industries to identify hazards, evaluate risks and establish methodology to mitigate risks and prevent workplace injuries and illnesses. The OSHA White Paper on Injury and Illness Prevention Programs refers to such programs as an “effective, flexible, commonsense tool.” An effective safety program is not a one-size-fits-all, write it and forget it product. Nor is it a magic bullet. It is not the safety program itself which “protects” the worker from harm, rather it is an adaptable and constantly evolving document which must be modified to meet the specific objectives of those it serves and seeks to safeguard as a part of the company's safety management practices.

ANSI A10.38, Basic Elements of an Employer's Program to Provide a Safe and Healthful Work Environment

The original version of the A10.38 standard was released in 1991. This standard was then revised in 2000, reaffirmed in 2007 and revised again in 2013. This document establishes through industry consensus what the elements are that all construction safety programs should contain. These basic elements include, but are not limited to, the following:
Management support
Employee participation
Hazard identification and risk assessment
Hazard prevention and control
Worker education and training
Program assessment
Program evaluation and improvement

The content of the A10.38 standard has been used for years as a boilerplate for safety program development and as a tool to evaluate existing safety programs. It has been refined as industry and safety cultures have matured. As a management standard, it is designed to be used in concert with the other A10 management standards including but not limited to ANSI A10.33 Safety and Health Program Requirements for Multi-Employer Projects, ANSI A10.1 Pre-Project and Pre-Task Safety and Health Planning, and ANSI A10.39 Construction Safety and Health Audit Program.

The process set forth in A10.38 begins with hazard identification and evaluation of risk. The employer must review his workplace and identify hazards, those conditions or environmental elements which have the potential to cause harm. Once hazards are recognized, the employer must evaluate the risks associated with those hazards. Risk level depends upon frequency of exposure and potential severity of exposure to particular hazards. The hierarchy of controls is used as a systematic approach to eliminate, reduce or control these risks. ANSI A10.38 also identifies 32 specific topics and key program elements which all construction employers should address. These topics include:

- A policy statement indicating management’s commitment and ultimate responsibility to provide a safe and healthful workplace
- Reference to applicable rules and regulations
- Identification of responsibilities of employees and an expectation that no work be performed without the presence of a designated competent person and supervision
- Training including new-hire, continuous, and supervisory training and evaluation of training effectiveness
- Safety inspection procedures and responsibilities.
- Methods for the communication of workplace hazards and changes or additions to the safety program
- Employee workplace hazard reporting and follow-up
- Performance of job or task hazard analyses to identify hazards of specific tasks
- Establishment of permit systems for special tasks or hazards (i.e. confined spaces, etc.)
- Health hazard identification process
- Emergency response planning
- Procedures relating to substance abuse, horseplay and workplace violence
- Injury and illness reporting and recordkeeping
- Incident investigation procedures including management review
- Disciplinary procedures relating to safety rules violations
- Motor vehicle operations and work-zones
- Mobile equipment operations
- Establishment of project specific safety programs
- Procedures for coordinating with other contractors
- Procedures relating to management of sanitation and hydration
An additional list of sample program components is contained in Appendix A, which can be used by employers as a checklist to identify other safety programs which might be needed for their particular exposures. Additionally, the A10.38 standard expands upon specific elements which include guidance relating to implementation of the program, aspects relating to responsibility and authority, and evaluation of a safety program. Guidance is also provided relating to accountability, training and employee participation. Evaluation of an existing program may be accomplished by the use of this standard and ANSI A10.39, *Construction and Demolition Operations Safety and Health Audit Program.*

**OSHA**

Supplemental to and similar in scope to the ANSI A10.38 standard, federal OSHA has a number of regulations and guidance documents relating to safety programs. OSHA’s *Safety and Health Program Management Guidelines* were issued in 1989 and are non-mandatory guidelines that identify major elements of a safety program. These four major elements include the following:

- Management commitment and employee involvement
- Worksite analysis
- Hazard prevention and control
- Safety and health training

As a general requirement, 29 CFR 1926.20 instructs construction employers to “initiate and maintain such programs as may be necessary to comply with this part.” Within individual OSHA standards are references to written safety programs and plans including but not limited to Hazard Communication (29 CFR 1910.1200), Emergency Action Plan (29 CFR 1926.35 and 1910.38), Hearing Conservation Plan (29 CFR 1910.95), Respirator Program (29 CFR 1910.134), Confined Space Entry Program (29 CFR 1910.146), Lockout-Tagout (29 CFR 1910.147), Bloodborne Pathogens (29 CFR 1910.1030), and Fall Protection Program (29 CFR 1926.502 (k)). Additionally, OSHA is currently engaged in the rulemaking process known as the Injury and Illness Prevention Program (I2P2). OSHA’s rulemaking process to require safety programs for general industry and maritime started with stakeholder meetings in 1995 and was removed from the regulatory agenda in 2002. In 2010 the process began again and I2P2 is on the current federal Register in the Proposed Rule Stage of OSHA’s rulemaking process.

OSHA’s Injury and Illness Prevention Programs web page indicates that 34 states have some type of initiative relating to safety programs in part of full through either their state OSHA plans or their workers’ compensation laws. Some are mandatory, and others are non-mandatory, though most are not comprehensive and are limited in scope to portions of a safety management program. Most of these programs are nearly identical in scope to ANSI A10.38 and federal OSHA’s guidelines. A few of the more comprehensive programs are identified below:

- Arkansas requires that “Hazardous Employers” develop a health and safety plan
- California requires all employers with more than 10 employees to implement a written Injury and Illness Prevention Program
- Idaho State Insurance Fund requires employers to implement loss prevention programs
- Louisiana Workers Compensation requires employers implement an Operational Safety Plan
- Michigan requires Construction Accident Prevention Programs
- Montana Safety Culture Act requires implementation of a safety program
- Nebraska’s Workplace Safety Consultation Law requires employers establish a safety committee which adopts and maintains a written injury prevention program
• Nevada requires a written safety program for all employers working in the state
• New York’s Department of Labor requires the establishment of a safety and loss prevention program
• North Carolina requires a safety and health program and safety and health committee be established by employers with EMR of 1.5 or higher
• Oregon OSHA requires every employer implement a written safety and health program
• Washington OSHA requires employers implement an Accident Prevention Program

Other Safety Management Standards
ANSI/AIHA Z10-2012, Occupational Safety and Health Management Systems, OHSAS 18001:2007 Occupational Health and Safety Management Systems, and ILO-OSH:2001, Guidelines on Occupational Safety and Health Management Systems are three resources which are nearly parallel in their approach and recommendations for safety management. All three follow the “Plan-Do-Check-Act” methodology of safety management. This system works well with A10.38 and OSHA Safety Program Guidelines as the “Plan” aspect is the generation of the goals and objectives based on hazard identification and risk assessment. “Do” corresponds with implementation of the program’s policy and procedures. “Check” corresponds to the periodic review of the program through auditing. Finally, to close the loop, “Act” involves revision of programs triggered by results of assessments and audits, incident investigation results and even disciplinary/corrective action.

Both ANSI/AIHA Z10-2012, Occupational Safety and Health Management Systems and OHSAS 18001:2007, Occupational Health and Safety Management Systems identifies as a model for Occupational Health and Safety (OH&S) management systems five specific components in a continual improvement cycle. These components include:

• Establishment of an OH&S policy
• Planning
• Implementation and operation
• Checking and corrective action
• Management review

In OHSAS and Z10, the “OH&S Policy” (OHSAS) or “OHS Policy” (Z10) correlates with top management’s statement of its intention and direction for the safety and health of its employees and sets the framework for the OH&S objectives. Safety procedures within the company’s management system, which correlates to the content of most companies’ safety programs, support the OH&S Policy and the company’s pursuit of safety and health goals and objectives. The planning component includes hazard identification, risk assessment and identifying control methods and follows the Hierarchy of Controls. The planning step also includes means to ensure the company is in compliance with local rules and regulations. The implementation component includes establishment of responsibility, accountability and authority, training, communication, employee participation, documentation, emergency planning, and controls to manage risks (such as permitting systems). Checking and corrective action is accomplished through monitoring, program evaluation, incident investigation, and both internal and third party audits. Management review at regular intervals help tie the entire process together a part of the systems continuous improvement process. ANSI Z10 also includes sample programs, forms and guidance to help the company implement a sound safety and health management system.
While the ILO-OSH: 2001, *Guidelines on Occupational Safety and Health Management Systems* is nearly parallel with OHSAS 18001:2007, there are a few differences. ILO-OSH is primarily concerned with worker safety and health while the OHSAS standard is broader, including contractors and visitors. ILO-OSH also recommends specifically the formation of a safety committee, and establishment of safety and health promotional programs.

**The Good, the Bad and the Ugly**

How do we evaluate and recognize a “good” safety program? Furthermore, how do we refine it into a “great” one? One of the first items to consider is whether the program is in current use. Is it practical and applicable to the current company practices? When was the program last reviewed and updated by management? Every year there are changes to OSHA regulations and consensus standards which should be reflected, where applicable, in a company’s safety program. If the program references out of date processes such as the “OSHA 200 Log” (eliminated in 2001 and replaced with the 300 Log), then it is a good bet that the program is nothing more than a “dust collector.” A safety program should be reviewed at least annually by management, and should be updated when regulations change or the company identifies a need for a revision or addition based upon business practices and experience. Several companies I have audited in the past presented me with safety programs more than a decade old that had obviously not been referenced since the document had been written. A good program is current and regularly updated.

Another item to review is the comprehensiveness of the program. Does the program actually address all relevant safety procedures required for the scope of work that particular company engages in? Some companies think that their Hazard Communication or “Right to Know” program, complete with 15 year-old Material Safety Data Sheets and a brief rundown of employment rules from HR make for a complete safety program. These programs do not address the key components identified by ANSI A10.38, OSHA, Z10 or OHSAS.

The opposite problem is a program that suffers from overkill. Why would a residential finish carpenter installing cabinets in a house need a detailed confined space, excavation or steel erection program? Boilerplate programs are convenient but often are not adequately tailored to the company’s needs or updated as frequently as needed. One-size-fits-all programs do not fit all companies – unfortunately several large industry safety qualification programs tend to force a one-size-fits-all approach. In these cases, a company will sometimes develop a separate written program to submit for qualification and have two separate company safety programs. Challenges with this approach include the ability to keep up with changes and avoid discrepancies. Companies also should not make commitments in their program that they do not intend to enforce. Policies or rules which the company either cannot or will not implement fully have no place in a safety program. Failing to manage this effectively may set the company up for liabilities down the road.

The format of the program should fit the needs of the company as well. Consider who will be using the program. Is the information contained within the program clear, concise and easily applied or are there inconsistencies which can confuse employees and supervisors? Is the program document a door stop, unmanageable in its size and overly verbose, or is it a practical and useful tool? What works for any company depends on the culture of the company. Taking a hazard-based approach in formatting can make the program more useable for some people rather than organizing the content like a set of regulations. Including tools such as forms and checklists also will make the program more useable by properly trained field personnel. Some companies make use of current technology to make their programs more accessible and easily updatable by field personnel. What works best for the company may best be established by a joint
management- employee workgroup that can assess current needs. Periodically performing a
safety perception survey can also be useful in determine the usability and usefulness of the
company’s current program.

In conclusion, safety programs are an important tool in any company’s overall safety
management plan. Several guides are available which can guide the employer in developing their
safety program, all of which are very similar in scope and content. All include management
commitment, employee involvement, hazard assessment, training and continual improvement.
One’s safety plan must be a clearly written and practical document with a method of amendment
so that the plan can adapt. Pruning the unworkable and grafting in the needed in order to maintain
a document which can keep step with the company’s scope of producing a profitable, employee
friendly, safe and compliant work environment.

Bibliography


American National Standards Institute (ANSI)/American Society of Safety Engineers (ASSE).
2013. ANSI A10.38-2013, Basic Elements of an Employer's Program to Provide a Safe and
Healthful Work Environment. Des Plaines, IL: ASSE.

IL: ASSE.

Systems. London: BSI.

Safety and Health Management Systems.

Washington, D.C.: OSHA.

Occupational Safety and Health Administration (OSHA). “Injury and Illness Prevention
Programs.” (https://www.osha.gov/dsg/topics/safetyhealth/)