



Module 1: Management Leadership

Exercise: Discuss in small groups and be prepared to report out to the class.

What does Safety Leadership look like in your organization? What are some things that management can do to promote, or alternatively, diminish, safety in the organization?



Communicate Commitment to a Safety and Health Program

Many organizations have systems for implementing policies and procedures. These typically cover human resources, information technology, purchasing, quality assurance, and other programs that are essential to the business or workplace. Safety programs should be included with, and given at least equal weight, to these other programs.

Organizations may establish specific definitions and uses for policies, procedures, programs, and guidelines, but in general these are distinguished as follows:

Policies are high level position statements that provide direction and guidance for a given topic.

Procedures are a series of detailed, step-by-step instructions that describe how to accomplish an end goal

Guidelines are advice on how to act in a given situation. These are recommended, but not mandatory.

In practice, written policies and procedures are used to:

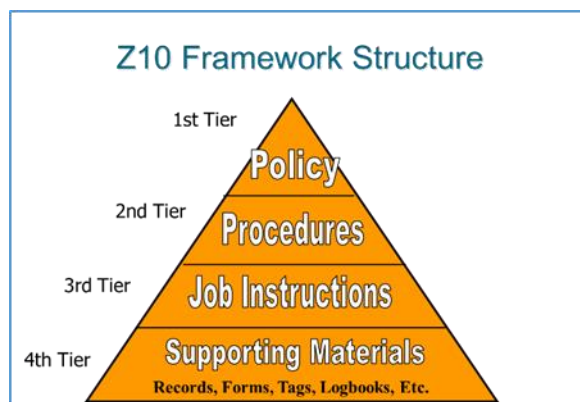
- Establish direction for the organization
- Meet legal requirements or establish acceptable risk
- Document accepted and prohibited practices
- Hold employees accountable

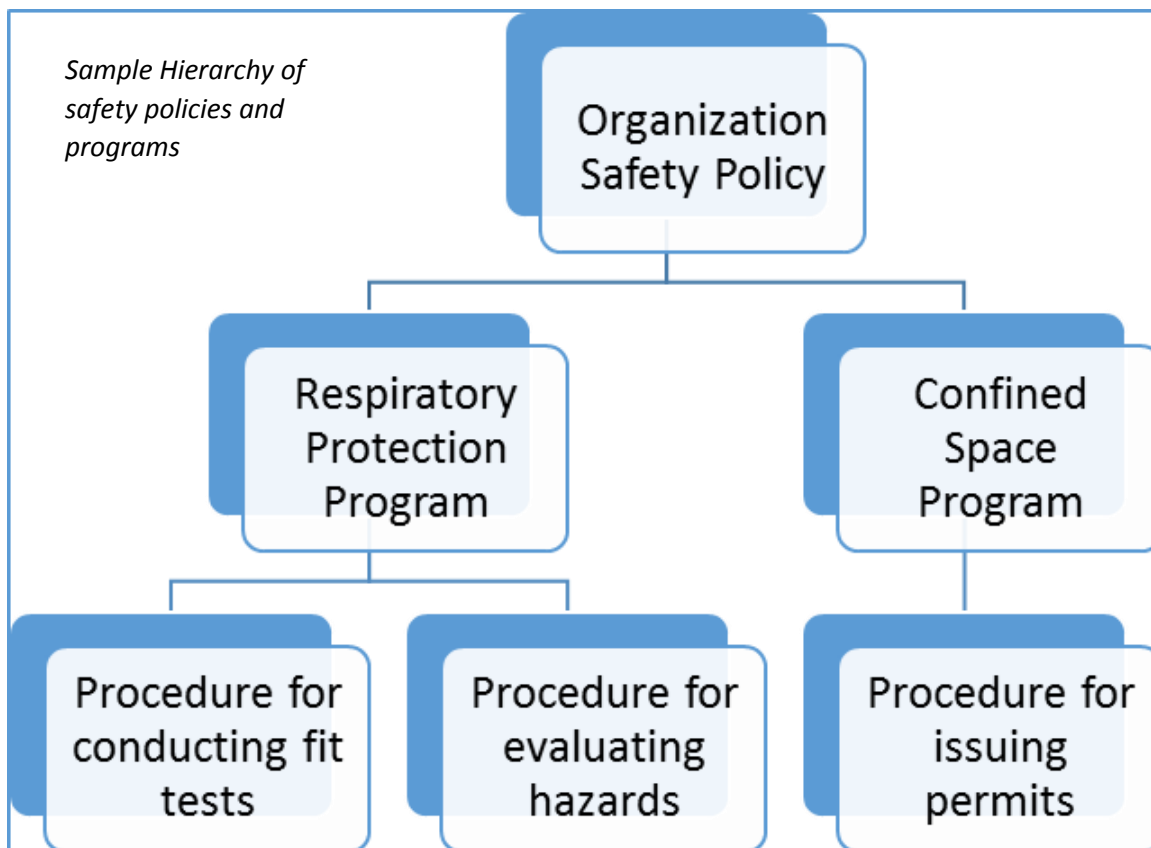
Guidelines may be used in training, or as reference documents, but are not generally sufficient to hold up in a legal or disciplinary action.

OSHA regulates a number of workplace hazards, and regulatory requirements generally require the employer to develop a written program that describes how hazards impact employees in the workplace, and how the employer works to address these hazards and meet OSHA requirements. Some examples of OSHA standards that require written programs include:

- Respiratory Protection (29 CFR 1910.134)
- Permit Required Confined Space (29 CFR 1910.146)
- Occupational Noise Exposure (29 CFR 1910.95)
- Hazard Communication (29 CFR 1910.1200)
- Bloodborne Pathogens (29 CFR 1910. 1030)
- Control of Hazardous Energy-Lockout/Tagout (29 CFR 1910. 147)

ANSI Z10, Occupational Health and Safety Management Systems, provides a framework structure that describes how these documents interrelate: Procedures support the high level written policy, job instructions support procedures, and other supporting materials, documents, or guidelines provide additional information supporting job instructions.







Exercise: In your groups, develop a high level safety policy statement for either:

- America’s Best Cabinets, a company that manufactures cabinets and has 40 employees
 - XYZ Construction, a construction company that acts as a general contractor for civil construction projects,
Or
 - Your own organization
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Tips for Writing Programs that are Effective in Practice:

Audience:

It is important to keep the audience in mind when developing written materials. The audience for written safety programs can include:

- Employees
- Executives and managers who sign off on the program
- Line supervisors who have responsibility for implementing any portion of the program and disciplining employees who fail to follow the program
- Human Resources
- Union representatives
- Personnel conducting accident investigations
- Auditors
- Medical providers
- Worker's compensation administrators, adjudicators, and oversight agencies
- OSHA inspectors
- Lawyers
- *And...for employers subject to the Public Records Disclosure Act...the Media*

Stakeholder input:

A safety program cannot be written in a vacuum. Effective programs include stakeholder input in the development process.

- **Executive** level sign off demonstrates management support for the program. Even when a written program is required, it is helpful to know that you will have executive level buy off before you start. Executives and managers who understand the need for the program, and have an opportunity to ask questions early on, are more likely to sign the final product once it is ready.
- **Human Resources** can provide appropriate language to ensure that in the event that an employee needs to be disciplined for failing to follow the program, the disciplinary action will be consistent with the organizations policies and will not create unanticipated consequences.
- **Line Supervisors** are subject matter experts on the work done in their areas. The program must accurately reflect the work that it covers, and line supervisors are the best source of information on what the work is. A program that does not reflect actual conditions will be difficult to follow and lack credibility with employees.
- **Employees** provide a reality check, and can provide input on whether the written program is something they can follow. Washington State, for example, requires that safety committees review the written safety program and discuss recommendations for improvement, if needed.

In small organizations, several of these functions may be performed by the same people.

Programs must be based on a worksite hazard analysis, as discussed in Module 3.



Clarity:

An effective program is one that is followed by all members of the organization. Clearly outlined responsibilities within a written program or procedure allow personnel within the organization better understanding of the actions they need to take to meet program requirements.

Many organizations have performance standards that specify that employees must work safely, and that employees who do not work safely will be disciplined. In fact, enforcement agencies have an expectation that an employer discipline employees who fail to follow requirements outlined in regulatory requirements or internal programs. It is unfair to employees to mete out discipline for policies that are not clearly outlined, and most often, union grievances will not hold up if the discipline is not based on a clear standard.

OSHA’s Recommended Practices incorporate a program evaluation and improvement component, and ANSI Z10 includes an auditing component. A good test of clarity when developing a written program is to consider if, and how, each action statement could be audited.

Consider which statements provide the clearest direction. How would each statement be audited?

Sample statement:	What is auditable?	Alternative statement:	What is auditable?
“Employees must store respirators properly.”		“Employees must store respirators in clean hard shelled containers issued by the safety department.”	
“Supervisors must make sure employees are properly qualified to wear respirators.”		“Supervisors must make sure that employees who wear respirators: <ul style="list-style-type: none"> • are on the list of employees who are medically cleared for respirator use, • have completed respiratory protection training as documented in the XYZ Company’s Learning Management System, • and have passed a fit test within the past year for the respirator that they have been issued.” 	
“Employees will be trained in respirator use.”		“Employees must complete their initial Respiratory Protection training before they are issued a respirator.”	
“The Safety Department evaluates the effectiveness of the Respiratory Protection		“The Respiratory Protection Program Administrator monitors program effectiveness by: <ul style="list-style-type: none"> • Conducting monthly 	



Program.”		<p>walkthroughs of the shops to observe use of respirators by employees</p> <ul style="list-style-type: none"> • Reviewing accident investigation reports • Assigning staff to conduct formal audits on an annual basis. Audit reports of the respiratory protection program are distributed to the executive team in June of each year.” 	
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Use appropriate tense:

In language, present tense conveys that an action that is currently practiced, future tense conveys an action that is anticipated, and past tense conveys an action that is complete. It is important to use appropriate tense to clarify intent of the actions described in written programs, policies, and procedures.

Consider the following statements and resulting implications:

Statement:	Implication:
“XYZ company <i>has conducted</i> hazard evaluations for all shops where employees use respirators.”	Hazard evaluations are complete and the requirement is met.
“XYZ Company <i>conducts ongoing</i> hazard evaluations in shops where employees use respirators.”	Conduction of hazard evaluations is an ongoing process. If work processes change, there is a process in place to conduct a new hazard evaluation.
“XYZ Company <i>will conduct</i> hazard evaluations in shops where employees use respirators”	Hazard evaluations have not been completed, or perhaps even started. They will be done at some point in the future. This begs the question of whether or not employees are wearing respirators in situations where a hazard evaluation has not yet been completed.

The majority of statements included in written programs should be written in **present tense**, since the program should reflect current practices.

Past tense is appropriate to describe a single action that is not going to be repeated, for example “XYZ Company *began using respirators in 2004.*”

Future tense is appropriate to describe actions that are planned or anticipated:

“XYZ Company *will begin a new production process in 2020, and respirator use for this process will be evaluated in 2019.*”



or

“If the CO sensor goes into alarm, employees will put on their emergency escape respirators and evacuate the area.”

Use appropriate action words:

Use language to clarify when an action is a recommendation and when the action is a requirement. For example, the word “should” indicates that the action is a guideline or recommendation, and the word “must” indicates that the action is a requirement.

Once a program draft is finalized, it is a good practice to review the document to make sure that all “should” and “must” actions are appropriately worded. In practice, it is difficult to enforce a requirement if the wording indicates that it is actually a guideline.

Corporate programs vs. site specific programs:

Large organizations may establish programs that go beyond the minimum requirements of a regulation, and these internal requirements would then be outlined in a Corporate Safety Program. Corporate programs may also be used to establish overall policy and guidance for an organization.

However, depending on the configuration of the company or organization, a corporate program may or may not meet requirements for a specific plant or job site safety. If a corporate program describes requirements in fairly general terms, a site specific program will also be needed to outline site specific hazard analysis, identify a site program administrator and local contractors, and any site specific procedures.

In multi-state organizations, a Corporate program will unlikely be able to incorporate requirements of specific state plans. Site specific program administrators need to be knowledgeable of the requirements of the states and localities that they operate in.

Define Program Goals

There is an old saying: “What gets measured gets done.” Many companies establish Key Performance Indicators, or KPIs, to measure outcomes in production, sales, quality, or other outcomes that provide input as to how well the business is performing.

Safety is no different: An effective safety program has defined goals and outcomes for the program.

Performance indicators can be leading or lagging. Examples of lagging indicators in a business are:

- Number of sales in a given month
- Number of quality defects in a production cycle
- Number of employee accidents per year

Examples of leading indicators are:

- Number of sales calls made per month
- Number of quality inspections per production cycle
- Number of safety committee meetings held per year



A number of factors can contribute to lagging indicators. For example, if an indicator of number of incidents (accidents) per year is selected as a measure, incident rates may increase or decrease from year to year. If incident rates decrease, it may be due to effective, proactive measures taken by the organization. That is the hope. However, a decrease in incidents could also be the result of employees being discouraged from reporting workplace incidents.

In small organizations, an incident rate is problematic in comparing year to year safety performance. Incident rates are calculated and compared to national averages using the formula:

$$\text{Recordable Incident Rate} = \left(\frac{\text{Number of recordable incidents}}{\text{Number of hours worked}} \right) \times 200,000$$

If a worksite with 20 employees has one work related incident every 5 years, the 5 year incident rate would likely be comparable to the national average for the industry. However, when broken down annually, there would be 4 years in which the workplace recordable incident rate is 0, and one year in which the recordable incident rate is about 5 times the national average. If a corporate organization uses recordable incident rates as a Key Performance Indicator across multiple worksites, that fifth year would provide an unfortunate metric for the small worksite.

OSHA, in their Recommended Practices for Safety and Health Programs, suggests using setting goals emphasizing injury and illness prevention, or leading indicators, as performance metrics. These goals should be realistic and measurable. Examples of measurable, leading indicator safety goals are:

- Conduct 12 safety committee meetings per year
- Complete 100% of required employee safety training
- Complete 100% of scheduled monthly safety inspections
- Respond to all employee safety suggestions within 5 working days.

Allocate Resources

Safety programs and procedures define expectations, including what needs to be done and what is needed for that to happen. However, safety programs cannot be successful if resources do not match these expectations.

For example, OSHA's standard for the Control of Hazardous Energy (Lockout/Tagout) requires that machines are shutdown and measures are taken to prevent unexpected startup of the machine while the employee is working on it. Steps required for lockout/tagout take time, so this extra time would need to be included in the employee's allotted time to complete the task. In addition, lockout/tagout requires specific equipment, including unique and identifiable locks, tags, lockout devices, and possibly other equipment, which needs to be provided and included in annual budgets. Lockout procedures need to be developed to support the program; the employee assigned to develop these procedures must be given the time to write and test the procedures. Lastly, employees who perform lockout tagout must be trained, so the employer needs to ensure that employees are provided training and are given the appropriate amount of time to attend training in the schedule. The cost of the training class also needs to be covered.



The safety and health program needs to be included in the organization's annual budget. It is helpful to review the established safety program goals, and any written safety programs, to ensure that employee time for training and safety meetings, training offerings, tools, equipment and personal protective equipment are all identified in the budget and adequately funded.

Expect Performance

A well written program assigns responsible parties to identified actions.

For example:

"Sally Jones is responsible for maintaining respirator fit test records of employees."

Or

"The Safety Manager is responsible for maintaining fit test records of employees."

Some organizations, for policy reasons, prefer to use job titles instead of names. The thought is that responsibilities are most effective when they are assigned to a designated position rather than individual. This ensures that the task or assignment has an assigned "owner" in the event that an individual leaves the organization or moves to a different position. Using the job title, instead of the name, indicates that if Sally Jones leaves the organization, the new Safety Manager is responsible for maintaining the fit test records.

When a title is used in a program, it must specifically identify the position to which the responsibility is assigned. For example the following statement clearly indicates an assigned responsibility:

"The Safety Manager is responsible for maintaining fit test records of employees."

The alternate statement, below, is less clear about which individual has responsibility for fit test records, and would not be acceptable:

"An XYZ Company manager is responsible for maintaining fit test records of employees."

Safety responsibilities in written programs are then carried into the expectations for the individual position. If the written Respiratory Protection Program assigns responsibility for maintaining fit test records to Sally Jones, the Safety Manager, this should be reflected in her annual performance plan, and her success in maintaining the annual fit test records would also be reflected in her annual performance review.

Similarly, if employees in the paint shop are required under the written Respiratory Protection program to wear respirators in the paint booth, receive annual medical evaluations, attend training, and get their annual fit tests, these metrics should be included their in annual performance plans and reviews. The requirement to wear a respirator should also be included in the job description.

Managers and leaders should be expected to lead by example, or in other words, "walk the talk."

Managers, supervisors, and anyone else in a leadership position should be expected to follow the same safety requirements as their employees. If paint shop employees are required to wear respirators inside the paint booth, the paint shop supervisor should not enter the paint booth without a respirator. When paint shop employees attend their annual respirator protection training, there should be an expectation

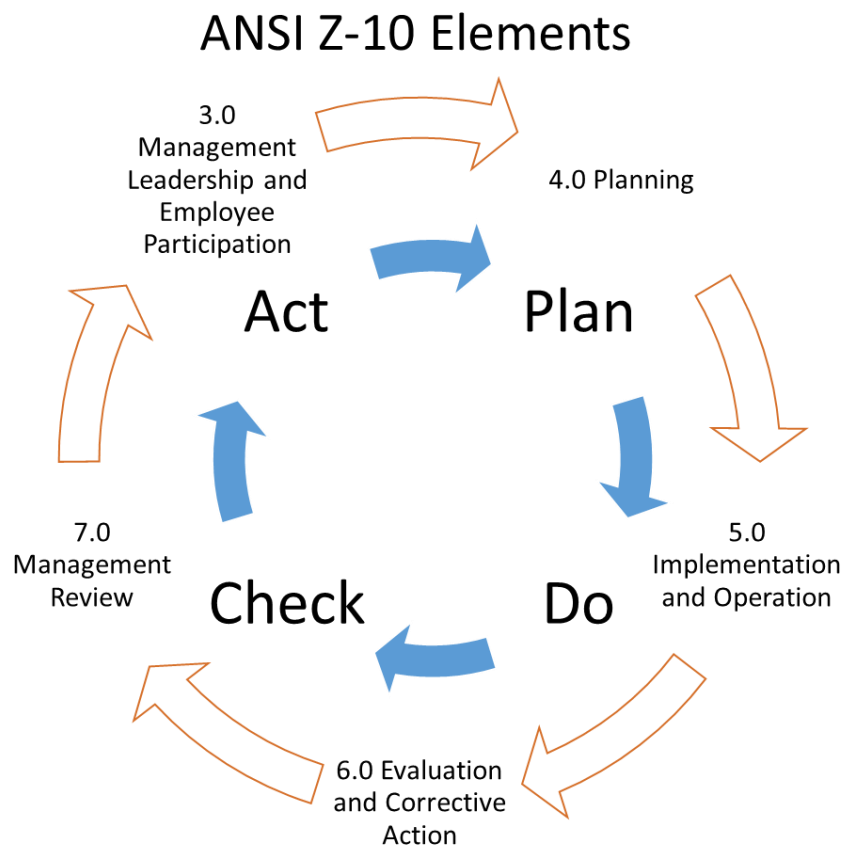


that the paint shop supervisor also attend the training. Afterwards, the paint shop supervisor should reinforce the contents of the training in day-to-day supervision of paint shop employees.

Consensus Standards

Consensus standards can provide additional information and background on effective health and safety management systems.

- ANSI Z10 was developed by the American National Standards Institute, and is based on the Plan-Do-Check-Act management model of continuous improvement popularized by Dr. W Edwards Deming. This model is also utilized in international standards, such as ISO 9000, Quality Management, and ISO 14000, Environmental Management. Many of the elements covered in ANSI Z10 are similar to those found in OSHA's Recommended Practices for Safety and Health Programs and can serve as an additional resource in implementing the core actions.
- OSHAS 18001 is an accreditation granted through Certification Europe. An employer may pursue this certification in order to demonstrate that it has an effective health and safety management program.





Accident Prevention Program

Several state OSHA programs require written safety programs. Within Region 10, Washington requires employers to develop a written Accident Prevention Program, or APP (WAC 296-800-140). Elements of an Accident Prevention Program include:

- A Safety Orientation
 - Description of the total safety and health program
 - On the job orientation for initial job assignments
 - How to report on the job injuries
 - Location of first aid facilities in the workplace
 - How to report unsafe conditions and practices
 - Use and care of required Personal Protective Equipment (PPE)
 - What do do in an emergency, including how to exit the workplace
 - Identification of hazardous gasses, chemicals, or materials and instruction on what do do in the event of an accidental exposure
- A health and safety committee
- Additional written programs required under specific standards

Additional requirements include developing, supervising, implementing and enforcing safety and health programs, and ensuring that the accident prevention program is effective in practice.

OSHA Tools

OSHA offers several e-tools that are helpful in developing health and safety programs:

- <https://www.osha.gov/dts/osta/oshasoft/>
- <https://www.osha.gov/SLTC/etools/construction/shprogram.html>



Accident prevention program

WAC 296-800-140 Accident prevention program.

Your responsibility: To establish, supervise, and enforce an accident prevention program (APP) that is effective in practice. (You may call this your total safety and health plan).

<i>You must meet the requirements</i>	<i>in this section</i>
Develop a formal, written accident prevention program (APP)	WAC 296-800-14005
Develop, supervise, implement, and enforce safety and health training programs that are effective in practice	WAC 296-800-14020
Make sure your accident prevention program (APP) is effective in practice	WAC 296-800-14025

WAC 296-800-14005 Develop a formal, written accident prevention program.

You must:

- Develop a formal accident prevention program that is outlined in writing. The program must be tailored to the needs of your particular workplace or operation and to the types of hazards involved.

Note: The term “accident prevention program” refers to your written plan to prevent accidents, illnesses, and injuries on the job. Your accident prevention program may be known as your safety and health plan, injury prevention program, or by some other name.

You must:

- Make sure your Accident Prevention Program contains at least the following elements:
 - A safety orientation:
 - ◆ A description of your total safety and health program.
 - ◆ On-the-job orientation showing employees what they need to know to perform their initial job assignments safely.
 - ◆ How and when to report on-the-job injuries including instruction about the location of first-aid facilities in your workplace.
 - ◆ How to report unsafe conditions and practices.
 - ◆ The use and care of required personal protective equipment (PPE).
 - ◆ What to do in an emergency, including how to exit the workplace.



296-800 WAC
Safety and Health Core Rules

- ◆ Identification of hazardous gases, chemicals, or materials used on-the-job and instruction about the safe use and emergency action to take after accidental exposure.
- A safety and health committee (WAC 296-800-130)

Helpful Tool: Additional Program Requirements Table. The table will help you determine additional programs, plans, and other related requirements that might be needed beyond your accident prevention program (your total safety and health plan). If you are required to have additional written programs or procedures, they can be included in your accident prevention program or covered in supplemental documents. You can find a copy of this table in the Resource Section of this book.

WAC 296-800-14020 Develop, supervise, implement, and enforce safety and health training programs that are effective in practice.

You must:

- Develop, supervise, implement, and enforce training programs to improve the skill, awareness, and competency of all your employees in the field of occupational safety and health.
- Make sure training includes on-the-job instruction to employees prior to their job assignment about hazards such as:
 - Safe use of powered materials-handling equipment such as forklifts, backhoes, etc.
 - Safe use of machine tool operations
 - Use of toxic materials
 - Operation of utility systems

Helpful Tool: Training Documentation Form. The sample Training Documentation Form can help you verify in writing that each employee who needs training has received and understood it. You can find a copy of this sample form in the Resource Section of this book.

WAC 296-800-14025. Make sure your accident prevention program is effective in practice.

You must:

- Establish, supervise, and enforce your accident prevention program in a manner that is effective in practice.

Helpful Tool: Report of a Workplace Hazard Form. Your employees are encouraged to use this form to help carry out the Accident Prevention Program in your workplace. You can find a copy of this form in the Resource Section of this book.



Additional Program Requirements Table

This table will help you determine additional programs, plans, and other related requirements that might be needed beyond your accident prevention program (your total safety and health plan). If you are required to have additional written programs or procedures, they can be included in your accident prevention program or covered in supplemental documents.

To use this table:

1. Determine if any of the activities, hazards or situations listed in the first column apply to your workplace.
2. The second column lists what you may have to do or additional written programs you may be required to have.
3. Look-up the standard or rule that is in column three. This will allow you to determine if the actual situation at your workplace makes it necessary for you to do anything and will identify what you must do.



Note:

- There are record keeping requirements in chapter 296-27 WAC and elsewhere that you need to be aware of.
- Certain job-specific activities need written, site or activity-specific work plans (for example, the fall protection work plan and lead exposure in construction work).
- There are vertical standards that apply to specific industries, which may have additional program requirements. Be sure to check to find out if these standards apply to you.



Additional Program Requirements Table

1. If individuals in your workplace:	2. Then you may need to:	3. See:
Are exposed to hazards	Determine personal protective equipment (PPE) required based on a mandatory job hazard assessment. Written certification is also mandatory.	WAC 296-800-160
Work around hazardous chemicals	Establish a written chemical hazard communication program	WAC 296-800-170
Service, adjust, or maintain equipment in your workplace where people could be injured by the unexpected start-up of the machine or the release of stored energy	Establish a written energy control (lockout/tagout) program	Chapter 296-24 WAC, Part A-4 (After November 1, 2004 see Chapter 296-803 WAC)
Work around loud noise	Establish a hearing conservation program, including hearing tests and training	Chapter 296-817 WAC
Weld, cut, or do brazing	Make sure rules and instructions to operate and maintain oxygen or fuel-gas supply equipment are readily available	Chapter 296-24 WAC, Part I
Are required to use respirators or voluntarily use respirators to protect against airborne hazards	Establish a written respirator program	Chapter 296-842 WAC
May be exposed to blood or other potentially infectious material (bloodborne pathogens)	Establish a written exposure control plan	Chapter 296-823 WAC
May encounter confined spaces in your workplace	Conduct a survey to identify confined spaces. If employees are to enter confined spaces, special procedures and a written program may be required	Chapter 296-809 WAC
Work in late night retail (a retail establishment open between 11:00 p.m. and 6:00 a.m.)	Provide crime prevention training as part of your accident prevention program	Chapter 296-832 WAC
May be injured by an activated fire suppression system	Establish a written emergency action plan	Chapter 296-24 WAC, Part G-1
Are required to perform specific actions during emergency situations involving the release of hazardous substances	Establish a written emergency response plan or, if appropriate, a written emergency action plan	Chapter 296-824 WAC and Chapter 296-24 WAC, Part G-1
Are agricultural workers	Follow accident prevention program requirements in WAC 296-307-030. Agricultural employees aren't covered by chapter 296-24 WAC	Chapter 296-307 WAC
Are electrical workers working on or near high voltage	Include additional elements in your accident prevention program	Chapter 296-45 WAC
Are fire fighters	Develop a risk management policy with incident strategies that can be incorporated into the incident command system	Chapter 296-305 WAC

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Additional Program Requirements Table

1. If individuals in your workplace:	2. Then you may need to:	3. See:
Are exposed to substances such as asbestos, tremolite, anthophyllite, or atinolite	Establish and implement a written program to reduce employee exposure to or below the permissible limit	Chapter 296-62 WAC, Part I-1
Are involved in hazardous waste operations	Develop and implement a written safety and health program for these operations	Chapter 296-843 WAC
Are involved with diving operations	Develop and maintain a written safe practices manual	Chapter 296-37 WAC
Are involved with ski area facilities and operations	Develop a specific written safety program	Chapter 296-59 WAC
Are involved with telecommunications	Include additional elements in your accident prevention program that specifically cover this work	Chapter 296-32 WAC
May be exposed to specific air contaminants (listed in Chapter 296-62 WAC)	Establish and implement a written compliance program	Chapter 296-62 WAC, Part I
Use powered platforms installed as part of a building to do building maintenance	Provide written work procedures for the operation, safe use, and inspection of the equipment	Chapter 296-24 WAC, Part J-3
Work in laboratory using hazardous chemicals	Develop and carry out the provisions of a written chemical hygiene plan	Chapter 296-62 WAC, Part Q
Work in grain handling facilities	Develop and implement a written housekeeping program	Chapter 296-99 WAC
May be exposed to certain carcinogens (cancer causing agents)	Implement a written program to reduce exposure to or below permissible limits	Chapter 296-62 WAC, Part G
Work with toxic, reactive, flammable, or explosive chemicals (process safety management of highly hazardous chemicals)	Develop a written plan for preventing or minimizing the consequences of catastrophic releases	Chapter 296-67 WAC
Are blasting from an aircraft	This requires a written program approved by the Federal Aviation Administration and the director of the department of labor and industries	Chapter 296-59 WAC
Are exposed to operating coke ovens	Implement a written program to reduce employee exposure	Chapter 296-62 WAC, Part O