Recommended Practices for Safety and Health Programs

Student Materials
MTI Level One Course
Consultation Education and Training Division
Michigan Occupational Safety and Health Administration
Michigan Department of Licensing and Regulatory Affairs
www.michigan.gov/miosha
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Recommended Practices for Safety and Health Programs

Presented By:
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Objectives
• Learn how to kick off your S &H Program
• Explain The 7 Core Elements
• Action Items: How to accomplish each element

Source:

Module 1
How to kick off your Safety and Health Program

How to kick off your Safety and Health Program
• Establishing a safety and health program in your workplace is one of the most effective ways of protecting your most valuable asset: your workers.

Why do this?
• Losing workers to injury or illness, even for a short time, can cause significant disruption and cost—to the company, as well as the workers and their families.
• It can also damage workplace morale, productivity, turnover, and reputation.

Proactive vs. Reactive
• Safety and health programs foster a proactive approach to “finding and fixing” workplace hazards before they can cause injury or illness.
Proactive vs. Reactive
• Rather than reacting to an incident, management and workers collaborate to identify and solve issues before they occur.

Proactive vs. Reactive
• Traditional approaches are often reactive—that is, actions are taken only after a worker is injured or becomes sick, a new standard or regulation is published, or an outside inspection finds a problem that must be corrected.

Proactive vs. Reactive
• Finding and fixing hazards before they cause injury or illness is a far more effective approach. (Proactive)
• Doing so avoids the direct and indirect costs of worker injuries and illnesses, and promotes a positive work environment.

Continuous Improvement
• The concept of continuous improvement is central to the recommended practices.
• As with any journey, the first step is often the most challenging.

Results
• This collaboration builds trust, enhances communication, and often leads to other business improvements.
• Employers who have implemented safety and health programs, have also found that managing for safety results in higher-quality product or output and higher profits.

MVPP / MSHARP
• MVPP / MSHARP employers have improved their workplace safety and health programs and implemented activities or procedures that have produced outstanding results and contributed to improved safety and health for workers.
MVPP / MSHARP

• The programs have a 20+ year history, and they average a Days Away Restricted or Transferred (DART) case rate that is 52% below the average for its industry.
• Participation in the programs can also lead to lower employee turnover and increased productivity and cost savings.

Much has changed over the years

• The nature of work is evolving as the economy continues to shift from a manufacturing to a service base, and from a fixed to an often mobile workforce.

Much has changed over the years

• Automation of work activities means that technology, computers, and robotics are being integrated into our workplaces, often introducing new and different hazards.

Much has changed over the years

• Greater diversity in the workplace means that people from different backgrounds and cultures are working alongside each other, often speaking different languages.

Much has changed over the years

• An aging workforce and the rise of sedentary work and lifestyle means that some workers are at higher risk for work-related musculoskeletal disorders.
<table>
<thead>
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<th>Much has changed over the years</th>
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<td>• There is greater recognition that workers in industries that some think of as safe (such as healthcare, lodging, retail, and transportation) face significant hazards.</td>
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<th>Much has changed over the years</th>
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<td>• Increased temporary and contract employment, and the rise of the “gig economy” means that traditional relationships between workers and employers are shifting.</td>
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<th>Why the changes?</th>
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<tr>
<td>• These new recommended practices reflect these changes in the traditional relationships between employer &amp; employee.</td>
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<td>• They also reflect what we have learned from best-in-class programs and what makes them effective.</td>
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<th>Why the changes?</th>
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<td>• The recommended practices also stress the need for communication and coordination on worksites involving more than one employer.</td>
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<tr>
<td>• The new recommended practices build on successful approaches and practices that have evolved under MIOSHA programs such MVPP and MSHARP.</td>
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<td>• They also align with national and international consensus standards.</td>
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<th>The Benefits</th>
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<td>• Responsible employers know that the main goal of a safety and health program is to prevent workplace injuries, illnesses, and deaths, as well as the suffering and financial hardship these events can cause for workers, their families, and their employers.</td>
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The Benefits

• Employers may find that implementing these recommended practices brings other benefits as well.
• The renewed or enhanced commitment to safety and health and the cooperative atmosphere between employers and workers have been linked to:

  - Improvements in product, process, and service quality.
  - Better workplace morale.
  - Improved employee recruiting and retention.
  - A more favorable image and reputation (among customers, suppliers, and the community).

The Benefits

A study of small employers in Ohio found that workers’ compensation claims fell dramatically after working with OSHA’s SHARP program to adopt programs similar to those described in these recommended practices.

![Image showing the benefits of implementing a safety and health program.](source)

Module 2
How to use the recommended practices

• Each section of the recommended practices describes a core program element, followed by several action items.
• The first couple of “action items” for each element will be covered.
How to use the recommended practices

• Refer to OSHA’s SHP Guidelines for more “action items”

How to use the recommended practices

• You can also use the self-evaluation tool found on the recommended practices Web page to track your progress and assess how fully you have implemented (or will implement) each action item.

How to use the recommended practices

• Go to: https://www.osha.gov/shpguidelines/
• Select Additional Resources

How to use the recommended practices

Then select which element you desire to get additional resources on

Additional Resources by Core Element

Safety and health program resources and tools are listed alphabetically within each core element area below.

- Management Leadership
- Worker Participation
- Hazard Identification and Assessment
- Hazard Prevention and Control
- Education and Training
- Program Evaluation and Improvement
- Communication and Coordination for Host Employees, Contractors, and Staffing Agencies

Module 3

7 Interrelated Elements

7 Core Elements of the Safety and Health Program Recommended Practices
Seven interrelated elements
• The seven core elements are interrelated and are best viewed as part of an integrated system.
• Actions taken under one core element can (and likely will) affect actions needed under one or more other elements.

Seven interrelated elements
• Setting goals (as described under “Management Leadership”) will be more effective if you routinely evaluate your progress in meeting those goals (see “Program Evaluation and Improvement”).

Seven interrelated elements
• Progress in each core element is important to achieve maximum benefit from the program.

One size does not fit all
• While the action items under each core element are specific, they are not prescriptive.
• The process described in these recommended practices can, and should, be tailored to the needs of each workplace.

One size does not fit all
• What is important is that you learn from setbacks, remain committed to finding out what works best for you, and continue to try different approaches.

One size does not fit all
• Injuries and illnesses occur in all types of workplace settings, from manufacturing sites, to hospitals and healthcare facilities, to offices and service industries.
One size does not fit all

- The preventive approaches described in these recommended practices work equally well across all sectors of the economy.

One size does not fit all

- Small employers may find that they can best accomplish the actions outlined in these recommended practices using informal communications and procedures.

One size does not fit all

- Larger employers, who have more complex work processes and hazards, may require a more formal and detailed program.

The importance of worker participation

- This emphasis on worker participation is consistent with the Act, MIOSHA standards, and enforcement policies and procedures, which recognize the rights and roles of workers and their representatives in matters of workplace safety and health.

The importance of worker participation

- Several action items described in these recommended practices rely on perspectives, expertise, and input that can come only from workers and their representatives.
When more than one employer is involved

- Host employers, contractors, staffing agencies, and their workers should pay particular attention to the “Communication and Coordination for Host Employers, Contractors, and Staffing Agencies” section.

Module 4

10 Easy things to get your program started

1. SET SAFETY AND HEALTH AS A TOP PRIORITY
   - Always set safety and health as the top priority.

2. LEAD BY EXAMPLE
   - Practice safe behaviors yourself and make safety part of your daily conversations with workers.

3. IMPLEMENT A REPORTING SYSTEM
   - Develop and communicate a simple procedure for workers to report any injuries, illnesses, incidents (including near misses/close calls), hazards, or safety and health concerns without fear of retaliation.
4. PROVIDE TRAINING

• Train workers on how to identify and control hazards.

5. CONDUCT INSPECTIONS

• Inspect the workplace with workers and ask them to identify any activity, piece of equipment, or material that concerns them.

Self-Inspection Checklist

Source: https://www.osha.gov/Publications/smallbusiness/small-business.pdf

6. COLLECT HAZARD CONTROL IDEAS

• Ask workers for ideas on improvements and follow up on their suggestions.
• Provide them time during work hours, if necessary, to research solutions.
7. IMPLEMENT HAZARD CONTROLS

- Assign workers the task of choosing, implementing, and evaluating the solutions they come up with.

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8. ADDRESS EMERGENCIES

- Identify foreseeable emergency scenarios and develop instructions on what to do in each case.

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9. SEEK INPUT ON WORKPLACE CHANGES

- Before making significant changes to the workplace, work organization, equipment, or materials, consult with workers to identify potential safety or health issues.

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10. MAKE IMPROVEMENTS

- Set aside a regular time to discuss safety and health issues, with the goal of identifying ways to improve the program.

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7 Core Elements of the Safety and Health Program

Recommended Practices

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Module 5

First Element:
Management Leadership

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Source: http://pairadimes.davidtruss.com/leadership-and-management/
First Element: Management Leadership

Management Leadership

• Management provides the leadership, vision, and resources needed to implement an effective safety and health program.
• Management leadership means that business owners, managers, and supervisors:
  • Make worker safety and health a core organizational value.
  • Are fully committed to eliminating hazards, protecting workers, and continuously improving workplace safety and health.
  • Provide sufficient resources to implement and maintain the safety and health program.
  • Visibly demonstrate and communicate their safety and health commitment to workers and others.
  • Set an example through their own actions.

Individual Activity

• Complete Section 1 of the Safety and Health Program Audit Tool on Management Leadership

Action item 1

• Communicate your commitment to a safety and health program
• A clear, written policy helps you communicate that safety and health is a primary organizational value—as important as productivity, profitability, product or service quality, and customer satisfaction.
How to accomplish it

• Establish a written policy, signed by top management, describing the organization’s commitment to safety and health, and pledging to establish and maintain a safety and health program for all workers.

How to accomplish it

• Communicate the policy to all workers and, at appropriate times and places, to relevant parties, including:
  - Suppliers and vendors
  - Other businesses in a multi-tenant building
  - Visitors
  - Customers
  - Contractors, subcontractors, staffing agencies, and temporary workers at your worksite(s)

How to accomplish it

• Reinforce management commitment by considering safety and health in all business decisions, including contractor and vendor selection, purchasing, and facility design and modification.

Action item 2

• Define program goals
  • By establishing specific goals and objectives, management sets expectations for managers, supervisors, and workers, and for the program overall.
  • The goals and objectives should focus on specific actions that will improve workplace safety and health.

How to accomplish it

• Establish realistic, measurable goals for improving safety and health.
• Goals emphasizing injury and illness prevention should be included, rather than focusing on injury and illness rates.
**Action item 3**

- Allocate resources
  - Management provides the resources needed to implement the safety and health program, pursue program goals, and address program shortcomings when they are identified.

**How to accomplish it**

- Estimate the resources needed to establish and implement the program.
- Allow time in workers’ schedules for them to fully participate in the program.

**How to accomplish it**

- Integrate safety and health into planning and budgeting processes, and align budgets with program needs.
- Provide and direct resources to operate and maintain the program, meet safety and health commitments, and pursue program goals.

**Module 6**

Second Element: Worker Participation

**Second Element: Worker Participation**

- To be effective, any safety and health program needs the meaningful participation of workers and their representatives.
Worker Participation

- Worker participation means that workers are involved in establishing, operating, evaluating, and improving the safety and health program.

- All workers at a worksite should participate, including those employed by contractors, subcontractors, and temporary staffing agencies.

- In an effective safety and health program, all workers:
- Are encouraged to participate in the program and feel comfortable providing input and reporting safety or health concerns.
- Have access to information they need to participate effectively in the program.
- Have opportunities to participate in all phases of program design and implementation.

- Do not experience retaliation when they raise safety and health concerns; report injuries, illnesses, and hazards; participate in the program; or exercise safety and health rights.

ATTENTION EMPLOYEES

The Michigan Whistleblowers' Protection Act (460 P A, 1993) creates certain protections and obligations for employees and employers under Michigan law.

PROTECTIONS:

It is illegal for employers in Michigan to discharge, threaten or otherwise discriminate against you regarding your compensation, terms, conditions, location or privileges of employment because you or a person acting on your behalf reports or is about to report a violation of or a suspected violation of federal, state or local law, rules or regulations to a public body.

It is illegal for employers in Michigan to discharge, threaten or otherwise discriminate against you regarding your compensation, terms, conditions, location or privileges of employment because you take part in a public hearing, investigation, inquiry or court action.

The above is partial representation of the MI Whistleblowers’ Protection Act.
Individual Activity

- Complete Section 2 of the Safety and Health Program Audit Tool on Worker Participation

Action Item 1

- Encourage workers to participate in the program
- By encouraging workers to participate in the program, management sends a signal that it values their input into safety and health decisions.

How to accomplish it

- Time
- Acknowledgement/positive reinforcement
- Open door policy

Action Item 2

- Encourage workers to report safety and health concerns

Part 11. Recording and Reporting of Occupational Injuries and Illnesses

R 408.22135 Employee involvement.

- Rule 1135. (1) Basic requirement. Your employees and their representatives must be involved in the recordkeeping system as follows:
  - (a) You must inform each employee of how he or she is to report a work-related injury or illness to you.
  - (b) You must provide employees with the information described in subrule (2)(c) of this rule.
  - (c) You must provide access to your injury and illness records for your employees and their representatives.
How to accomplish it

- Empower all workers to initiate or request a temporary suspension or shutdown of any work activity or operation they believe to be unsafe.
- Involve workers in finding solutions to reported issues.

Action Item 3

- Give workers access to safety and health information
- Sharing relevant safety and health information with workers fosters trust and helps organizations make more informed safety and health decisions.

How to accomplish it

- Give workers the information they need to understand safety and health hazards and control measures in the workplace.
- Some MIOSHA standards require employers to make specific types of information available to workers, such as:

  - Safety Data Sheets (SDSs)
  - Injury and illness data

Other useful information for workers to review can include:

- Workplace job safety analysis (JSA/JHA)
- Workplace inspection reports
- Incident investigation reports

Module 7

Third Element:
Hazard Identification and Assessment
Third Element: Hazard Identification and Assessment

- One of the “root causes” of workplace injuries, illnesses, and incidents is the failure to identify or recognize hazards that are present, or that could have been anticipated.

Hazard Identification and Assessment

- A critical element of any effective safety and health program is a proactive, ongoing process to identify and assess such hazards.

Identify and Assess

- To identify and assess hazards, employers and workers can:
  - Collect and review information about the hazards present or likely to be present in the workplace.

Identify and Assess

- Conduct initial and periodic workplace inspections of the workplace to identify new or recurring hazards.
- Investigate injuries, illnesses, incidents, and close calls/near misses to determine the underlying hazards, their causes, and safety and health program shortcomings.

Identify and Assess

- For each hazard identified, determine the severity and likelihood of incidents that could result, and use this information to prioritize corrective actions.
Identify and Assess

• Some hazards, such as housekeeping and tripping hazards, can and should be fixed as they are found.

Identify and Assess

• Fixing hazards on the spot emphasizes the importance of safety and health and takes advantage of a safety leadership opportunity.

Individual Activity

• Complete Section 3 of the Safety and Health Program Audit Tool on
  • Hazard Identification and Assessment

Action Item 1

• Collect existing information about workplace hazards
  • Information on workplace hazards may already be available to employers and workers from both internal and external sources.

Information available in the workplace may include:

• Equipment and machinery operating manuals.
• SDSs provided by chemical manufacturers.
• Self-inspection reports and inspection reports from insurance carriers, government agencies, and consultants.

Information available in the workplace may include:

• Records of previous injuries and illnesses, such as 300 and 300a logs and reports of incident investigations.
• Workers’ compensation records and reports.
Information available in the workplace may include:

- Exposure monitoring results, industrial hygiene assessments, and medical records (appropriately redacted to ensure patient/worker privacy).
- Existing safety and health programs (LOTO, confined spaces, process safety management, PPE, etc.).

Information about hazards may be available from outside sources, such as:

- OSHA, National Institute for Occupational Safety and Health (NIOSH), and Centers for Disease Control and Prevention (CDC) websites, publications, and alerts.

Information available in the workplace may include:

- Input from workers, including surveys or minutes from safety and health committee meetings.
- Results of job safety analysis (JSAs, also known as job hazard analysis or JHAs).

Information about hazards may be available from outside sources, such as:

- Trade associations.
- Labor unions, state and local occupational safety and health committees/coalitions (“COSH groups”), and worker advocacy groups.
- Safety and health consultants.

**Action Item 2**

- Inspect the workplace for safety hazards

**Action Item 2**

- Setting aside time to regularly inspect the workplace for hazards can help identify shortcomings so that they can be addressed before an incident occurs.
How to accomplish it

• Be sure to document inspections so you can later verify that hazardous conditions are corrected.

How to accomplish it

• Include all areas and activities in these inspections, such as:
  – storage and warehousing
  – facility and equipment maintenance,
  – purchasing and office functions
  – activities of on-site contractors, subcontractors, and temporary employees.

How to accomplish it

• Regularly inspect plant vehicles (e.g., forklifts - powered industrial trucks, gold carts, etc.)

How to accomplish it

• Use checklists that highlight things to look for.
• Typical hazards fall into several major categories, such as those listed on the next slides

Categories of hazards

• General housekeeping
• Slips, trips, and fall hazards
• Electrical hazards
• Equipment operation
• Equipment maintenance

Categories of hazards

• Work practices
• Workplace violence
• Ergonomic problems
• Lack of emergency procedures
Seek the input of workers

- Before changing operations, workstations, or workflow; making major organizational changes; or introducing new equipment, materials, or processes, seek the input of workers and evaluate the planned changes for potential hazards and related risks.

Action Item 3

- Identify health hazards
  - Identifying workers’ exposure to health hazards is typically more complex than identifying physical safety hazards.

Identify health hazards

- Health hazards include chemical hazards (solvents, adhesives, paints, toxic dusts, etc.), physical hazards (noise, radiation, heat, etc.), biological hazards (infectious diseases), and ergonomic risk factors (heavy lifting, repetitive motions, vibration).

How to accomplish it

- Identify chemical hazards—review SDSs and product labels

How to accomplish it

- Identify physical hazards—identify any exposures to:
  - excessive noise
  - elevated heat
  - sources of radiation

How to accomplish it

- Identify biological hazards—determine whether workers may be exposed to sources of:
  - infectious diseases, molds, toxic or poisonous plants, or animal materials (fur or scat) capable of causing allergic reactions or occupational asthma.
How to accomplish it

• Identify **ergonomic risk factors**—examine work activities that require heavy lifting, work above shoulder height, repetitive motions, or tasks with significant vibration.

End of Day 1

• Reminder: 9 am start tomorrow

Start of Day 2

• Objectives:
  – Define and discuss Elements 4-7
  – Action items
  – How to accomplish it
  – Review
  – Assessment

Module 8

Fourth Element: Hazard Prevention and Control

Fourth Element: Hazard Prevention and Control
Fourth Element: Hazard Prevention and Control

- Effective controls protect workers from workplace hazards; help avoid injuries, illnesses, and incidents; minimize or eliminate safety and health risks; and help employers provide workers with safe and healthful working conditions.

Hazard Prevention and Control

- To effectively control and prevent hazards, employers should:
- Involve workers, who often have the best understanding of the conditions that create hazards and insights into how they can be controlled.

- Identify and evaluate options for controlling hazards, using a “hierarchy of controls.”

Source: NIOSH

How to accomplish it

- Select controls according to a hierarchy that emphasizes engineering solutions (including elimination or substitution) first, followed by safe work practices, administrative controls, and finally PPE.

Hazard Prevention and Control

- Develop plans with measures to protect workers during emergencies and non-routine activities.
Individual Activity

- Complete Section 4 of the Safety and Health Program Audit Tool on
- **Hazard Prevention and Control**

Action Item 1

- **Identify control options**
  - A wealth of information exists to help employers investigate options for controlling identified hazards.
  - Before selecting any control options, it is essential to solicit workers’ input on their feasibility and effectiveness.

How to accomplish it

- Review sources such as MIOSHA Standards and guidance, industry consensus standards, NIOSH publications, manufacturers’ literature, and engineering reports to identify potential control measures.

How to accomplish it

- Keep current on relevant information from trade or professional associations.
  - Investigate control measures used in other workplaces and determine whether they would be effective at your workplace.

How to accomplish it

- Get input from workers who may be able to suggest and evaluate solutions based on their knowledge of the facility, equipment, and work processes.

How to accomplish it

- For complex hazards, consult with safety and health experts, including the free services from MIOSHA’s Consultation Education and Training Division (CET).
Action Item 2

- **Select controls**
- Employers should select the controls that are the most feasible, effective, and permanent.

**How to accomplish it**

- Eliminate or control all serious hazards (hazards that are causing or are likely to cause death or serious physical harm) immediately.
- Use interim controls while you develop and implement longer-term solutions.

**How to accomplish it**

- Avoid selecting controls that may directly or indirectly introduce new hazards.
- Examples include exhausting contaminated air into occupied work spaces or using hearing protection that makes it difficult to hear backup alarms.

**How to accomplish it**

- Review and discuss control options with workers to ensure that controls are feasible and effective.
- Use a combination of control options when no single method fully protects workers.

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**Module 9**

Fifth Element: Education and Training

**Fifth Element: Education and Training**
Fifth Element: Education and Training

- Education and training are important tools for informing workers and managers about workplace hazards and controls so they can work more safely and be more productive.

- Another role of education and training, however, is to provide workers and managers with a greater understanding of the safety and health program itself, so that they can contribute to its development and implementation.

- Additional training may be needed depending on the roles assigned in the program.
- Employers, managers, and supervisors may need specific training to ensure that they can fulfill their roles in providing leadership, direction, and resources for the safety and health program.

Individual Activity

- Complete Section 5 of the Safety and Health Program Audit Tool on Education and Training

Action Item 1

- Provide program awareness training
- Managers, supervisors, and workers all need to understand the program's structure, plans, and procedures.
- Having this knowledge ensures that everyone can fully participate in developing, implementing, and improving the program.
Provide training on

• Functions of the safety and health program
• Whom to contact with questions or concerns about the program (including contact information)

Provide training on

• How to report hazards, injuries, illnesses, and close calls/near misses
• What to do in an emergency
• The employer’s responsibilities under the program
• Workers’ rights under The Act

How to accomplish it

• Provide information on the safety and health hazards of the workplace and the controls for those hazards.

How to accomplish it

• Ensure that training is provided in the language(s) and at a literacy level that all workers can understand.
• Emphasize that the program can only work when everyone is involved and feels comfortable discussing concerns; making suggestions; and reporting injuries, incidents, and hazards.

How to accomplish it

• Confirm, as part of the training, that all workers have the right to report injuries, incidents, hazards, and concerns and to fully participate in the program without fear of retaliation.

Action Item 2

• Train employers, managers, and supervisors on their roles in the program
• Employers, managers, and supervisors are responsible for workers’ safety, yet sometimes have little training on safety-related concepts and techniques.
Action Item 2

• They might benefit from specific training that allows them to fulfill their leadership roles in the program.

How to accomplish it

• Train employers, managers, and supervisors on procedures for responding to workers’ reports of injuries, illnesses, and incidents, including ways to avoid discouraging reporting.

How to accomplish it

• Instruct employers, managers, and supervisors on fundamental concepts and techniques for recognizing hazards and methods of controlling them, including the hierarchy of controls (see “Hazard Prevention and Control”).

How to accomplish it

• Instruct employers, managers, and supervisors on incident investigation techniques, including root cause analysis.

Action Item 3

• Train workers on their specific roles in the safety and health program

• Additional training may be needed to ensure that workers can incorporate any assigned safety and health responsibilities into their daily routines and activities.

How to accomplish it

• Instruct workers on how to report injuries, illnesses, incidents, and concerns.

• If a computerized reporting system is used, ensure that all employees have the basic computer skills and computer access sufficient to submit an effective report.
How to accomplish it

• Instruct workers assigned specific roles within the safety and health program on how they should carry out those responsibilities, including:

  • Hazard recognition and controls (see Action item 4)
  • Participation in incident investigations
  • Program evaluation and improvement

Action Item 4

• Train workers on hazard identification and controls
• Providing workers with an understanding of hazard recognition and control, and actively involving them in the process, can help to eliminate hazards before an incident occurs.

How to accomplish it

• Train workers on concepts and techniques for controlling hazards, including the hierarchy of controls and its importance.
• Instruct workers on concepts and techniques for controlling hazards, including the hierarchy of controls and its importance.

How to accomplish it

• Train workers on when and how to wear required PPE.
• Provide additional training, as necessary, when a change in facilities, equipment, processes, materials, or work organization could increase hazards, and whenever a worker is assigned a new task.

Module 10

Sixth Element:
Program Evaluation and Improvement
Sixth Element: Program Evaluation and Improvement

• Once a safety and health program is established, it should be evaluated initially to verify that it is being implemented as intended.

Program Evaluation and Improvement

• After that, employers should periodically, and at least annually, step back and assess what is working and what is not, and whether the program is on track to achieve its goals.

Program Evaluation and Improvement

• Whenever these assessments identify opportunities to improve the program, employers, managers, and supervisors—in coordination with workers—should make adjustments and monitor how well the program performs as a result.

Program Evaluation and Improvement

• Sharing the results of monitoring and evaluation within the workplace, and celebrating successes, will help drive further improvement.

Program Evaluation and Improvement

• Evaluating the program initially, and periodically thereafter, to identify shortcomings and opportunities for improvement.
• Providing ways for workers to participate in program evaluation and improvement.
Program Evaluation and Improvement

- This element includes:
  - Establishing, reporting, and tracking goals and targets that indicate whether the program is making progress.

Individual Activity

- Complete Section 6 of the Safety and Health Program Audit Tool on
  - Program Evaluation and Improvement

Action Item 1

- The first step in monitoring is to define indicators that will help track performance and progress.
- Next, employers, managers, supervisors, and workers need to establish and follow procedures to collect, analyze, and review performance data.

How to accomplish it

- Develop and track indicators of progress toward established safety and health goals.

Action Item 1

- Leading indicators track how well various aspects of the program have been implemented and reflect steps taken to prevent injuries or illnesses before they occur.

Action Item 1

- Both lagging and leading indicators should be used.
- Lagging indicators generally track worker exposures and injuries that have already occurred.
Track **lagging indicators**, such as:

- The number and severity of injuries and illnesses.
- Results of worker exposure monitoring that show that exposures are hazardous.
- Workers’ compensation data, including claim counts, rates, and cost.

Track **leading indicators**, such as:

- Level of worker participation in program activities
- Number of employee safety suggestions
- Number of hazards, near misses, and first aid cases reported

Track **leading indicators**, such as:

- Amount of time taken to respond to reports
- Number and frequency of management walkthroughs
- Number and severity of hazards identified during inspections

Track **leading indicators**, such as:

- Number of workers who have completed required safety and health training
- Number of workers who have completed required safety and health training

Track **leading indicators**, such as:

- Timely completion of planned preventive maintenance activities
- Worker opinions about program effectiveness obtained from a safety climate or safety opinion survey

**How to accomplish it**

- Analyze performance indicators and evaluate progress over time.
- Share results with workers and invite their input on how to further improve performance.
How to accomplish it

• When opportunities arise, share your experience and compare your results to similar facilities within your organization, with other employers you know, or through business or trade associations.

Action Item 2

• Verify that the program is implemented and is operating.
• Initially and at least annually, employers need to evaluate the program to ensure that it is operating as intended, is effective in controlling identified hazards, and is making progress toward established safety and health goals and objectives.

Action Item 2

• The scope and frequency of program evaluations will vary depending on changes in OSHA standards; the scope, complexity, and maturity of the program; and the types of hazards it must control.

How to accomplish it

• Verify that the core elements of the program have been fully implemented.

How to accomplish it

• Involve workers in all aspects of program evaluation, including reviewing information (such as incident reports and exposure monitoring results); establishing and tracking performance indicators; and identifying opportunities to improve the program.

How to accomplish it

• Verify that the following key processes are in place and operating as intended:
  – Reporting injuries, illnesses, incidents, hazards, and concerns
  – Conducting workplace inspections and incident investigations
How to accomplish it

- Tracking progress in controlling identified hazards and ensuring that hazard control measures remain effective
- Collecting and reporting any data needed to monitor progress and performance

How to accomplish it

- Review the results of any compliance audits to confirm that any program shortcomings are being identified.
- Verify that actions are being taken that will prevent recurrence.

Module 11

Seventh Element:
Communication and coordination for host employers, contractors, and staffing agencies

Seventh Element:

- In today's economy, an increasing number of workers are assigned by staffing agencies to work at specific “host” worksites under the direction and control of the host employer.

Seventh Element:

- In other situations, some workers are employed by a host employer and others by a contractor or subcontractor.
Seventh Element:

- These are referred to as "multi-employer" worksites.

Temporary worker and multi-employer situations

- In both temporary and multi-employer situations, safety is enhanced if employers establish mechanisms to coordinate their efforts and communicate effectively to afford all workers equal protection against hazards.

Temporary worker and multi-employer situations

- These mechanisms include measures to ensure that all workers on site (and their representatives) can participate in preventing injuries and illnesses.

- Failure to take these steps may undermine safety programs.

Definitions

- **Host employer**: An employer who has general supervisory authority over the worksite, including controlling the means and manner of work performed and having the power to correct safety and health hazards or require others to correct them.

Definitions

- **Contractor**: An individual or firm that agrees to furnish materials or perform services at a specified price, and controls the details of how the work will be performed and completed.

Definitions

- **Staffing agency**: A firm that provides temporary workers to host employers. A staffing agency hires its own employees and assigns them to support or supplement a client’s workforce in situations involving employee absences, temporary skill shortages, seasonal workloads, and special projects.
Definitions

• **Temporary workers:** Workers hired and paid by a staffing agency and assigned to work for a host employer, whether or not the job is actually temporary.

Communication and Coordination

• Effective communication and coordination among such employers means that:
  – Before coming on site, contractors and staffing agencies and their workers are aware of:
    – The types of hazards that may be present.
    – The procedures or measures they need to use to avoid or control their exposure to these hazards.
    – How to contact the host employer to report an injury, illness, or incident or if they have a safety concern.

Communication and Coordination

– The types of hazards that may be present.
– The procedures or measures they need to use to avoid or control their exposure to these hazards.
– How to contact the host employer to report an injury, illness, or incident or if they have a safety concern.

Host employers and their workers are aware of:

– The types of hazards that may arise from the work being done on site by workers employed by contractors or staffing agencies.
– The procedures or measures needed to avoid or control exposure to these hazards.
– How to contact the contract or staffing firm if they have a safety concern.
– What to do in case of an emergency.

Individual Activity

• Complete Section 7 of the Safety and Health Program Audit Tool on
• Communication and Coordination for Host Employers, Contractors, and Staffing Agencies

Action item 1

• Establish effective communication
  – Each host employer establishes and implements a procedure to ensure the exchange of information about hazards present on site and the hazard control measures in place.
**How to accomplish it**

- The host employer communicates with contractors and staffing agencies to determine which among them will implement and maintain the various parts of the safety and health program, to ensure protection of all on-site workers before work begins.

**How to accomplish it**

- The host employer establishes and implements procedures to exchange information with contractors and staffing agencies about hazards present in the workplace and the measures that have been implemented to prevent or control such hazards.

**How to accomplish it**

- The host employer gathers and disseminates information sufficient to enable each employer to assess hazards encountered by its workers and to avoid creating hazards that affect workers on the site.

**How to accomplish it**

- Contractors and staffing agencies regularly give the host employer any information about injuries, illnesses, hazards, or concerns reported by their workers and the results of any tracking or trend analysis they perform.

**How to accomplish it**

- Each contractor establishes and implements a procedure for providing the host employer with information about the hazards and control measures associated with the work being done by its workers, and the procedures it will use to protect workers on the site.

**How to accomplish it**

- The host employer gives contract employers and staffing agencies the right to conduct site visits and inspections and to access injury and illness records and other safety and health information.
How to accomplish it

• The host employer communicates with contractors and staffing agencies and their workers about non-routine and emergency hazards and emergency procedures.

• Information is communicated before on-site work starts and, as needed, if conditions change.

How to accomplish it

• Host employers:
  – Include in contracts and bid documents any safety-related specifications and qualifications and ensure that contractors and staffing agencies selected for the work meet those requirements.

How to accomplish it

• Host employers coordinate with contractors and staffing agencies to:
  – Ensure that work is planned and scheduled to minimize impacts on safety.

How to accomplish it

• Host employers:
  – Identify issues that may arise during on-site work and include procedures to be used by the host employer and contractors and/or staffing agencies for resolving any conflicts before work starts.

How to accomplish it

• Host employers coordinate with contractors and staffing agencies to:
  – Ensure that work is planned and scheduled to minimize impacts on safety.
  – Ensure that staffing agency workers are adequately trained and equipped before arriving on the worksite.

Action item 2

• Establish effective coordination
  – Host employers, contractors, and staffing agencies coordinate on work planning, scheduling, and resolving program differences to identify and work out any concerns or conflicts that could impact safety or health.
How to accomplish it

• Host employers coordinate with contractors and staffing agencies to:
  – Harmonize their safety and health policies and procedures to resolve important differences, so that all workers at the site have the same protection and receive consistent safety information.

How to accomplish it

• Host employers and staffing agencies:
  – Work together to deal with unexpected staffing needs by ensuring that enough trained and equipped workers are available or that adequate lead time is provided to train and equip workers.

How to accomplish it

• Host employers and staffing agencies:
  – Make sure that managers with decision-making authority are available and prepared to deal with day-to-day coordination issues.

End of Day 2

• Objectives:
  ✓ Define & discuss Elements 3-7
  ✓ Action items
  ✓ How to accomplish it
  ✓ Review
  ✓ Assessment

Assessment

• The purpose of this assessment is to validate the knowledge learned in class.
• Passing score of 70% correct is required.
• Class reference materials/books are not allowed to be used during the test.
• Collaboration/discussion with others is not allowed during the test.
• Answers will be reviewed after everyone completes and submits their test.

Online Transcript

https://webadvisor.macomb.edu

What?
• Check individual courses – Proficient / Not Proficient
• Track courses taken through the MTI
• Request a transcript to show certification
• Manage account information
How?
• Select What's My User ID?
• Key in the Last Name and SS# or Macomb ID
• Select Log In
• If you need help call 586-498-4106 or email mti@macomb.edu
Thank You For
Attending This Presentation

Michigan Occupational Safety and Health Administration
Consultation Education and Training Division
530 W. Allegan Street, P.O. Box 30643
Lansing, Michigan 48909-8143

For further information or to request consultation, education and training services, call 517-284-7720 or visit our website at www.michigan.gov/miosha
Recommended Practices for Safety and Health Programs

Student Internet Resources

MIOSHA Standards:

General Industry Safety and Health Standards

MIOSHA Publications:

Your Rights and Responsibilities Under MIOSHA (CET-0101)
Safety and Health Programs (CET-0107)
Overview of MVPP (CET-0144a)
Self-Inspection Checklist (CET-0156)
Safety and Health Management System Fact Sheet (CET-0179)
Safety and Health Management System Evaluation for General Industry (MIOSHA 512-GI)
SDS Location Poster (CET-2105)
New or Revised SDS Poster (CET-2106)
Safety and Health Management System Guidelines (SP #2)
Job Safety Analysis (blank form)

Other Resources:

OSHA’s Recommended Practices for Safety and Health Programs webpage

CDC

OSHA's Recommended Practices for Safety and Health Programs (OSHA 3885)
Michigan Department of Licensing and Regulatory Affairs
Michigan Occupational Safety and Health Administration
Consultation Education and Training Division
525 W. Allegan Street., P.O. Box 30643
Lansing, Michigan 48909-8143

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