

# Human Capital

## RISK & REWARD!

The Risk Management Learning Center



MARCH 2015 EDITION

## A FOUR-POINT WORKPLACE PROGRAM:

As you review this publication, we encourage you to use the Action Plan Worksheet in *Appendix A* to jot down the things you want to do to make your workplace safe for your employees. Noting those actions as you go along will make it easier to assemble the total plan you need.

### 1. MANAGEMENT COMMITMENT AND EMPLOYEE INVOLVEMENT

As the owner or manager of a small business, your attitude toward job safety and health will be reflected by your employees. If you are not interested in preventing employee injury and illness, your employees will probably not give safety and health much thought either.

Therefore, it is essential that you demonstrate at all times your personal concern for employee safety and health, and the priority you place on them in your workplace. Your policy must be clear. Only you can show its importance through your own actions.

You can demonstrate the depth of your commitment by involving your employees in planning and carrying out your efforts. If you seriously involve your employees in identifying and resolving safety and health problems, they will bring their unique insights and energy to achieving the goals and objectives of your program. The men and women who work for you are among the most valuable assets you have. Their safety, health and goodwill are essential to the success of your business. Having them cooperate with you in protecting their safety and health not only helps to keep them healthy-it makes your job easier.

#### Here are some actions to consider:

Post your policy on worker safety and health next to the OSHA Workplace Poster where all employees can see it. (*See Appendix B, Model Policy Statements.*)

- Hold a meeting with all employees to communicate your safety and health policy, and discuss your objectives for safety and health.
- Make sure that your support is visible by getting personally involved in the activities that are part of your safety and health program. For example, personally review all inspection and accident reports and ensure that follow-up occurs when needed.
- Ensure that you, your managers and your supervisors follow all safety requirements that apply to all employees, even if you are only in an area briefly. If, for instance, you require a hard hat, safety glasses and/or safety shoes in an area, wear them yourself when you are in that area.
- Take advantage of your employees' specialized knowledge and encourage them to buy into the program by having them make inspections, conduct safety training, or investigate accidents.

### **Actions continued:**

- Make clear assignments of responsibility for every part of your safety and health program, and make sure everyone understands them. The more people who are involved, the better. A good rule of thumb is to assign safety and health responsibilities in the same way you assign production responsibilities. Make it a special part of everyone's job to work safely.
- Give those with safety and health responsibility enough people, time, training, money and authority to get the job done.
- Don't forget your safety and health program after you make assignments; make sure the job gets done. Recognize and reward those who do well and correct those who don't.
- At least once a year, review what you have accomplished in meeting your objectives and re-evaluate whether you need new objectives or program revisions.
- Institute an accountability system where all personnel will be held accountable for not following work rules designed to promote workplace safety and health.

## **2. WORKSITE ANALYSIS**

It is your responsibility to know what items or processes that helps you make sure that you know what you need to keep your workers safe. For help in getting started with these processes, you can call on your state on-site Consultation Program and have an experienced health and safety professional visit your workplace for free and confidentially. Locations for each state are listed on OSHA's website. Also, OSHA's booklet, Job Hazard Analysis, may be helpful.

### **Here are some actions to consider:**

- Request a consultation visit from your state on-site Consultation Program covering both safety and health to get a full survey of the hazards that exist in your workplace and those that could develop. You can also contract for such services from expert private consultants if you prefer.
- Establish a way to get professional advice when you make changes to procedures or equipment, to ensure that the changes are not introducing new hazards into your workplace. Find ways to keep current on newly recognized hazards in your industry.
- Periodically review with employees each job, analyzing it step-by-step to see if there are any hidden hazards in the equipment or procedures.
- Set up a self-inspection system to check your hazard controls and evaluate any new hazards.
- Make sure your employees feel comfortable in alerting you or another member of management when they see things that look dangerous or out of place.
- Learn how to conduct a thorough investigation when things go wrong. This will help you develop ways to prevent recurrences. Extensive information can be found on OSHA's website under "Accident Investigation" in the index.
- Review several years of injury or illness records to identify patterns that can help you devise strategies to improve your safety and health program. Periodically review several months of experience to determine if any new patterns are developing.

### 3. HAZARD PREVENTION AND CONTROL

Once you have identified your existing and potential hazards, you are ready to implement the systems that prevent or control those hazards. Your state Consultation Program can help you do this. Whenever possible, hazards should be eliminated. Sometimes that can be done through substitution of a less toxic material or engineering controls. When you cannot eliminate hazards, systems should be established to control them.

#### Here are some actions to consider:

- Set up safe work procedures based on an analysis of the hazards in your workplace and ensure that employees understand and follow them. It is a good idea to involve employees in the analysis that results in those procedures. (See **Appendix C**, Codes of Safe Practices.)
- Be ready to enforce the rules for safe work procedures. Ask your employees to help you establish a disciplinary system that will be fair and understood by everyone.
- Where necessary, ensure that personal protective equipment (PPE) is used and that your employees know why they need it, how to use it and how to maintain it.
- Provide for regular equipment maintenance to prevent breakdowns that can create hazards. Ensure that preventive and regular maintenance are tracked to completion.
- Plan for emergencies, including fire and natural disasters. Conduct frequent drills to ensure that all employees know what to do under stressful conditions.
- Ask your state consultant to help develop a medical program that fits your worksite. Involve nearby doctors and emergency facilities by inviting them to visit your workplace and help you plan the best way to avoid injuries and illness during emergency situations.
- Ensure the ready availability of medical personnel for advice and consultation on matters of employee health. **This does not mean that you must provide health care**, but you must be prepared to deal with medical emergencies or health problems connected to your workplace.

#### To fulfill the above requirements, consider the following:

- Develop an emergency medical procedure to handle injuries, transport ill or injured workers and notify medical facilities. Posting emergency numbers is a good idea. (see attached)
- Survey the medical facilities near your place of business and make arrangements for them to handle routine and emergency cases. Cooperative agreements may be possible with nearby larger workplaces that have on-site medical personnel and/or facilities.
- Ensure that your procedure for reporting injuries and illnesses is understood by all employees.
- Perform routine walkthroughs of the worksite to identify hazards and to track identified hazards until they are corrected.
- If your business is remote from medical facilities, you are **required** to ensure that adequately trained personnel are available to render first aid. First aid supplies must be readily available for emergency use. Arrangements for this training can be made through your local Red Cross chapter, your insurance carrier, your local safety council, and others.
- Check battery charging stations, maintenance operations, laboratories, heating and ventilating operations and any corrosive materials areas to make sure the **required** eye-wash facilities and showers are operational.
- Consider retaining a local doctor or an occupational health nurse on a part-time or as-needed basis for advice on medical and first aid planning.

#### **4. TRAINING FOR EMPLOYEES, SUPERVISORS AND MANAGERS**

An effective accident prevention program requires proper job performance from everyone in the workplace.

As an owner or manager, you must ensure that all employees know about the materials and equipment they work with, known hazards and how to control the hazards.

##### **Each employee needs to know that:**

- no employee is expected to undertake a job until he or she has received job instructions on how to do it properly and is authorized to perform that job. Also,
- no employee should undertake a job that appears unsafe.

You may be able to combine safety and health training with other training, depending upon the types of hazards in your workplace.

##### **Here are some actions to consider:**

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

##### **Documenting Your Activities**

Document your activities in all elements of the Four-Point Workplace Program. Essential records, including those legally required for workers' compensation, insurance audits and government inspections must be maintained as long as the actual need exists or as required by law. Keeping records of your activities, such as policy statements, training sessions, safety and health meetings, information distributed to employees, and medical arrangements made, is greatly encouraged. Maintaining essential records also will demonstrate sound business management as supporting proof for credit applications, for showing "good faith" in reducing any proposed penalties from OSHA inspections, for insurance and other audits, and aid efficient review of your current safety and health activities for better control of your operations and to plan improvements.

## Safety and Health Recordkeeping

Records of sales, costs, profits and losses are essential to all successful businesses. They enable the owner or manager to learn from experience and to make corrections for future operations. Records of accidents, related injuries, illnesses and property losses can serve the same purpose, if they are used in the same way. The primary purpose of OSHA-required recordkeeping is to retain information about accidents that have happened to help determine the causes and develop procedures to prevent a recurrence.

### INJURY/ILLNESS RECORDS

OSHA rules for recording and reporting occupational injuries and illnesses affect 1.4 million establishments. Small businesses with 10 or fewer employees throughout the year are exempt from most of the requirements of the OSHA recordkeeping rules, as are a number of specific industries in the retail, service, finance, insurance and real estate sectors that are classified as low-hazard. Detailed information about OSHA recordkeeping rules can be found at [OSHA's website](#) or refer to 29 Code of Federal Regulations (CFR) 1904 for the specific exceptions.

OSHA recordkeeping can help the small business employer evaluate the success of safety and health activities. Success can be measured by a reduction or elimination of employee injuries and illnesses during a calendar year.

The OSHA recordkeeping system has five steps:

1. Obtain a report on every injury or job-related illness requiring medical treatment (other than basic first aid).
2. Record each injury or job-related illness on OSHA Form 300 (*Log of Work-Related Injuries and Illnesses*) using the instructions provided.
3. Prepare a supplementary record of occupational injuries and illnesses for recordable cases on OSHA Form 301 (*Injury and Illness Incident Report*).
4. Every year, prepare an annual summary using OSHA Form 300A (*Summary of Work-Related Injuries and Illnesses*). Post it no later than February 1, and keep it posted until May 1. A good place to post it is next to the OSHA Workplace Poster.
5. Retain these records for at least five years. Periodically review these records to look for any patterns or repeat situations. These records can help you to identify high-risk areas that require your immediate attention.

*Basic OSHA recordkeeping requirements address only injuries and illnesses, so you might consider expanding your own records to include all incidents, including those where no injury or illness resulted. This information may assist you in pinpointing unsafe conditions and/or procedures. Safety councils, insurance carriers and others can assist you in instituting such a system.*

*The employer is required to report to OSHA within eight hours of the accident, all work-related fatalities or multiple hospitalizations that involve three or more employees.*

*Even if your business is exempt from routine recordkeeping requirements, you may be selected by the Federal Bureau of Labor Statistics (BLS) or a related state agency for inclusion in an annual sample survey. You will receive a letter directly from the agency with instructions, if you are selected.*

## EXPOSURE RECORDS AND OTHERS

In addition to injury/illness records, certain OSHA standards require records on the exposure of employees to toxic substances and hazardous exposures, physical examination reports and employment records.

As you identify hazards, you will be able to determine whether these requirements apply to your workplace. Your records should be used in conjunction with your control procedures and with your self-inspection activity. They should not be considered merely as bookkeeping.



SOURCE: <https://www.osha.gov/Publications/smallbusiness/small-business.html#fourpoint>

## Safety Pays!

*"Reducing Workers' Compensation premiums one claim at a time"*

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**BE  
PREPARED!**

**Seconds Can Save  
Lives**

**CALLING FROM:**

**FIRE:**

**POLICE:**

**AMBULANCE:**

**DOCTOR:**

**HOSPITAL:**

**SECURITY:**

**SAFETY DIRECTOR:**

**OTHER:**

**OTHER:**

**WORKER FATALITY  
REPORT LINE:**

**Safety Pays!**

## Appendix A: Overall Action Plan Worksheet

Major Action Steps to be Taken	Priority (Assign each Step a Number)	Projected Completion Date	Actual Completion Date
1. _____ _____ _____	_____	_____	_____
2. _____ _____ _____	_____	_____	_____
3. _____ _____ _____	_____	_____	_____
4. _____ _____ _____	_____	_____	_____
5. _____ _____ _____	_____	_____	_____
6. _____ _____ _____	_____	_____	_____
7. _____ _____ _____	_____	_____	_____
8. _____ _____ _____	_____	_____	_____
9. _____ _____ _____	_____	_____	_____
10. _____ _____ _____	_____	_____	_____



## Action Steps

Description of Action to be Taken:

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Specific Steps Required	Persons Assigned	Projected Completion Date	Problems/ Delays Encountered	Actual Completion Date
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## Appendix B: Model Policy Statements

The following statements provide examples that can be used or modified by employers to help prevent employee injury and illness.

“The Occupational Safety and Health Act of 1970 clearly states our common goal of safe and healthful working conditions. The safety and health of our employees continues to be the first consideration in the operation of this business.”

“Safety and health in our business must be a part of every operation. Without question it is every employee’s responsibility at all levels.”

“It is the intent of this company to comply with all laws. To do this we must constantly be aware of conditions in all work areas that can produce injuries. No employee is required to work at a job he or she knows is not safe or healthful. Your cooperation in detecting hazards and, in turn, controlling them is a condition of your employment. Inform your supervisor immediately of any situation beyond your ability or authority to correct.”

“The personal safety and health of each employee of this company is of primary importance. The prevention of occupationally-induced injuries and illnesses is of such consequence that it will be given precedence over operating productivity whenever necessary. To the greatest degree possible, management will provide all mechanical and physical facilities required for personal safety and health in keeping with the highest standards.”

“We will maintain a safety and health program conforming to the best practices of organizations of this type. To be successful, such a program must embody the proper attitudes toward injury and illness prevention on the part of supervisors and employees. It also requires cooperation in all safety and health matters, not only between supervisor and employee, but also between each employee and his or her co-workers. Only through such a cooperative effort can a safety program in the best interest of all be established and preserved.”

“Our objective is a safety and health program that will reduce the number of injuries and illnesses to an absolute minimum, not merely in keeping with, but surpassing, the best experience of operations similar to ours. Our goal is zero accidents and injuries.”

“Our safety and health program will include:

- Providing mechanical and physical safeguards to the maximum extent possible.
- A program of safety and health inspections to identify and eliminate unsafe working conditions or practices, to control health hazards, and to comply fully with the safety and health standards for every job.
- Training all employees in good safety and health practices.
- Providing necessary personal protective equipment and instructions for its use and care.
- Developing and enforcing safety and health rules and requiring that employees cooperate with these rules as a condition of employment.
- Investigating, promptly and thoroughly, every accident to find out what caused it and to correct the problem so that it won’t happen again.
- Setting up a system of recognition and awards for outstanding safety service or performance.”

“We recognize that the responsibilities for safety and health are shared:

- The employer accepts responsibility for leadership of the safety and health program, for its effectiveness and improvement, and for providing safe conditions.
- Supervisors are responsible for developing the proper attitudes toward safety and health in themselves and in those they supervise, and for ensuring that all operations are performed with the utmost regard for the safety and health of all personnel involved, including themselves.
- Employees are responsible for compliance with all rules and regulations and for continuously practicing safety while performing their duties.”

## Appendix C: Codes of Safe Practices

This is a suggested code. It is general in nature and includes many types of small business activities. It is intended only as a model that you can customize to describe your own work environment.

### General Policy

1. All employees of this firm shall follow these safe practice rules, render every possible aid to safe operations, and report all unsafe conditions or practices to the supervisor/employer.
2. Supervisors shall insist that employees observe and obey every rule, regulation, and order necessary to the safe conduct of the work and take such action necessary to obtain compliance.
3. All employees shall be given frequent accident prevention instructions. Instructions, practice drills, and articles concerning workplace safety and health shall be given at least once every \_\_\_\_ working days.
4. Anyone known to be under the influence of alcohol and/or drugs shall not be allowed on the job while in that condition. Persons with symptoms of alcohol and/or drug abuse are encouraged to discuss personal or work-related problems with the supervisor/employer.
5. No one shall knowingly be permitted or required to work while his or her ability or alertness is impaired by fatigue, illness, or other causes that might expose the individual or others to injury.
6. Employees should be alert to see that all guards and other protective devices are in proper places and adjusted, and they shall report deficiencies. Approved protective equipment shall be worn in specified work areas.
7. Horseplay, scuffling, and other acts that tend to endanger the safety or well-being of employees are prohibited.
8. Work shall be well planned and supervised to prevent injuries when working with equipment and handling heavy materials. When lifting heavy objects, employees should bend their knees and use the large muscles of the legs instead of the smaller muscles of the back. Back injuries are the most frequent and often the most persistent and painful type of workplace injury.
9. Workers shall not handle or tamper with any electrical equipment, machinery, or air or water

lines in a manner not within the scope of their duties, unless they have received instructions from their supervisor/employer.

10. All injuries shall be reported promptly to the supervisor/employer so that arrangements can be made for medical and/or first-aid treatment. First-aid materials are located in \_\_\_\_\_; emergency, fire, ambulance, rescue squad, and doctors' telephone numbers are located \_\_\_\_\_; and fire extinguishers are located at \_\_\_\_\_.

### Suggested Safety Rules

- Do not throw material, tools, or other objects from heights (whether structures or buildings) until proper precautions are taken to protect others from the falling object hazard.
- Wash thoroughly after handling injurious or poisonous substances.
- Gasoline shall not be used for cleaning purposes.
- When using a ladder, always face the steps and use both hands while climbing.

### Use of Tools and Equipment

- Keep faces of hammers in good condition to avoid flying nails and bruised fingers.
- Files shall be equipped with handles; never use a file as a punch or pry.
- Do not use a screwdriver as a chisel.
- Do not lift or lower portable electric tools by the power cords; use a rope.
- Do not leave the cords of tools where cars or trucks will run over them.

### Machinery and Vehicles

- Do not attempt to operate machinery or equipment without special permission unless it is part of your regular duties.
- Loose or frayed clothing, dangling ties, finger rings, etc., must not be worn around moving machinery or other places where they can get caught.
- Machinery shall not be repaired or adjusted while in operation.

## OSHA Regional Offices

### Region I

(CT,\* ME, MA, NH, RI, VT\*)  
JFK Federal Building, Room E340  
Boston, MA 02203  
(617) 565-9860

### Region II

(NJ,\* NY,\* PR,\* VI\*)  
201 Varick Street, Room 670  
New York, NY 10014  
(212) 337-2378

### Region III

(DE, DC, MD,\* PA, VA,\* WV)  
The Curtis Center  
170 S. Independence Mall West  
Suite 740 West  
Philadelphia, PA 19106-3309  
(215) 861-4900

### Region IV

(AL, FL, GA, KY,\* MS, NC,\* SC,\* TN\*)  
61 Forsyth Street, SW, Room 6T50  
Atlanta, GA 30303  
(404) 562-2300

### Region V

(IL, IN,\* MI,\* MN,\* OH, WI)  
230 South Dearborn Street  
Room 3244  
Chicago, IL 60604  
(312) 353-2220

### Region VI

(AR, LA, NM,\* OK, TX)  
525 Griffin Street, Room 602  
Dallas, TX 75202  
(972) 850-4145

### Region VII

(IA,\* KS, MO, NE)  
Two Pershing Square  
2300 Main Street, Suite 1010  
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(816) 283-8745

### Region VIII

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1999 Broadway, Suite 1690  
PO Box 46550  
Denver, CO 80202-5716  
(720) 264-6550

### Region IX

(American Samoa, AZ,\* CA,\* HI,\* NV,\* and Guam,  
the Northern Mariana Islands and American  
Samoa)  
90 7th Street, Suite 18-100  
San Francisco, CA 94103  
(415) 625-2547

### Region X

(AK,\* ID, OR,\* WA\*)  
1111 Third Avenue, Suite 715  
Seattle, WA 98101-3212  
(206) 553-5930

\* These states and territories operate their own OSHA-approved job safety and health programs and cover state and local government employees as well as private sector employees. The Connecticut, New Jersey, New York and Virgin Islands plans cover public employees only. States with approved programs must have standards that are identical to, or at least as effective as, the Federal OSHA standards.

**Note:** To get contact information for OSHA Area Offices, OSHA-approved State Plans and OSHA Consultation Projects, please visit us online at [www.osha.gov](http://www.osha.gov) or call us at 1-800-321-OSHA.

### Contact Information

The most complete and current information and e-mail addresses for OSHA Regional and Area Offices and the state Consultation Projects can be found on OSHA's website at [www.osha.gov/html/oshdir.html](http://www.osha.gov/html/oshdir.html) or by contacting:

U.S. Department of Labor  
Occupational Safety and Health Administration  
Directorate of Cooperative and State Programs  
Office of Small Business Assistance  
200 Constitution Ave., NW  
Washington, DC 20210  
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