



A Guide to Written Workplace Safety



Your Road Map to Safety



This guide provides you with a strategy for developing a management plan to address safety concerns in your company. It's important that your workplace be as safe as you can possibly make it, and we believe this guide will help you to accomplish that goal.

If, after you have read this information, you experience any difficulty in the development of your Written Workplace Safety Program (WWSP), please contact the Safety Consultation and Training Section (SCATS) of the Division of Industrial Relations for assistance at 1-877-4SAFENV or at the locations listed below. You may also want to visit our website at www.4safenv.state.nv.us.

Let SCATS be **Your Partner for a Safer Nevada!** Services that can assist you include workplace surveys by safety consultants, air monitoring by industrial hygienists, and regulatory training programs, including training to assist you with your Written Workplace Safety Program.

Thank you for helping to make your place of work safe.

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P

PREFACE

Introduction2

Element 1 – Responsibility6

Element 2 – Hazard ID, Analysis and Control10

Element 3 – Training20

Element 4 –
Accident Investigation & Corrective Action28

Element 5 – Enforcement (Compliance)34

Element 6 – Safety Committee38

Implementing Your Program44

Other Requirements46

Frequently Asked Questions50

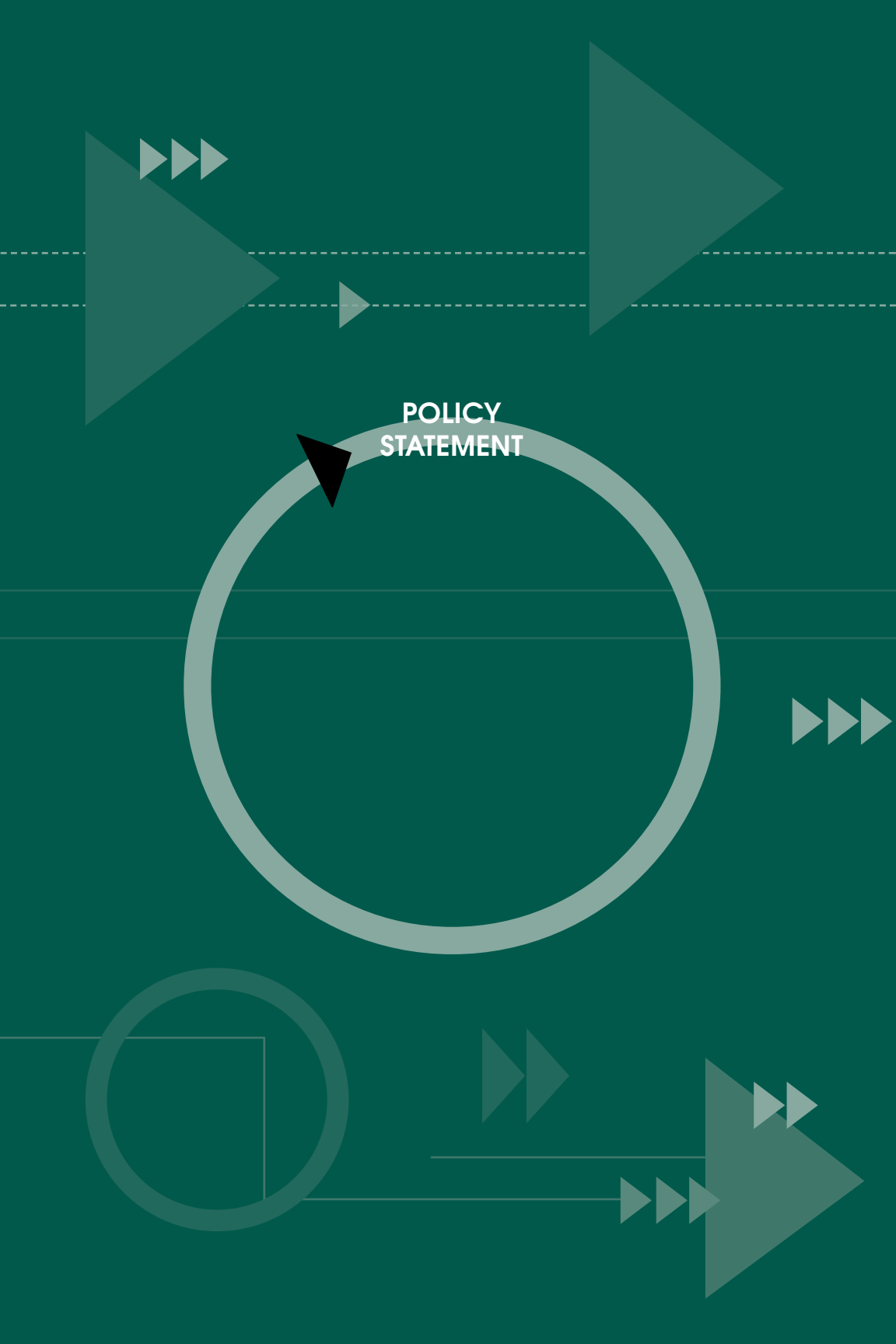
Appendix52

Checklist54

Information and Resources64

Services Response Form68





**POLICY
STATEMENT**



Introduction



WHAT IS A WRITTEN WORKPLACE SAFETY PROGRAM (WWSP)?

A WWSP is a management approach for identifying, evaluating, analyzing, and controlling workplace safety and health hazards. This includes developing systematic policies, procedures, and practices fundamental to creating and maintaining a safe and healthy working environment. Translation.... it's your road map for safety and health!

WHY DEVELOP A WWSP?

- The implementation of a WWSP is a proven and effective method for reducing the number of accidents and injuries among your employees. Controlling injuries can save your company money in workers' compensation costs, reduce employee time away from work, and help to improve employee productivity and morale.
- In Nevada, the law requires you to develop and implement a WWSP if your company manufactures explosives or has 11 or more employees.
- You and your business can potentially save a lot of money!

WHERE (HOW) DO I START?

First you will need to develop a safety policy statement.

Your safety policy statement should:

- Be signed by the most senior officer in the organization.
- Explain the goals and objectives of your safety and health program.
- Consist of short, clear and concise statements each employee can recite.
- Reinforce the principle that safety is everyone's responsibility.

HERE ARE A FEW EXAMPLES:

EXAMPLE 1:

Safety Policy Statement

"It is essential to our employees, customers and bottom line that we maintain a safe and healthy workplace. Managers and supervisors will ensure the policies adopted by the company assure that our employees are not injured at work are implemented and adhered to by all employees."

EXAMPLE 2:

Safety Policy Statement

“The personal safety and health of each employee of this company is of primary importance. Prevention of occupationally-induced injuries and illnesses is of such consequence that it will be given precedence over productivity, whenever necessary. To the greatest degree possible, management will provide necessary equipment, procedures, and training required for personal safety and health.”

ABOUT THIS GUIDE

In order to make developing a WWPS program easier, we have divided the program into six (6) legally-required elements. Their order is neither chronological nor hierarchical. You may find that some other approach works better for you or your operation. Go for it! This is a performance standard. That means we provide you with the basic requirements and you do whatever it takes to meet those requirements.

With almost any destination, there’s more than one way to get to a safe and healthy workplace! The objective is to have a working program which:

- addresses safety and health issues in your company,
- is implemented within your business, and
- readily adapts to changes in operation.

As you review the guide watch out for the following:



Caution

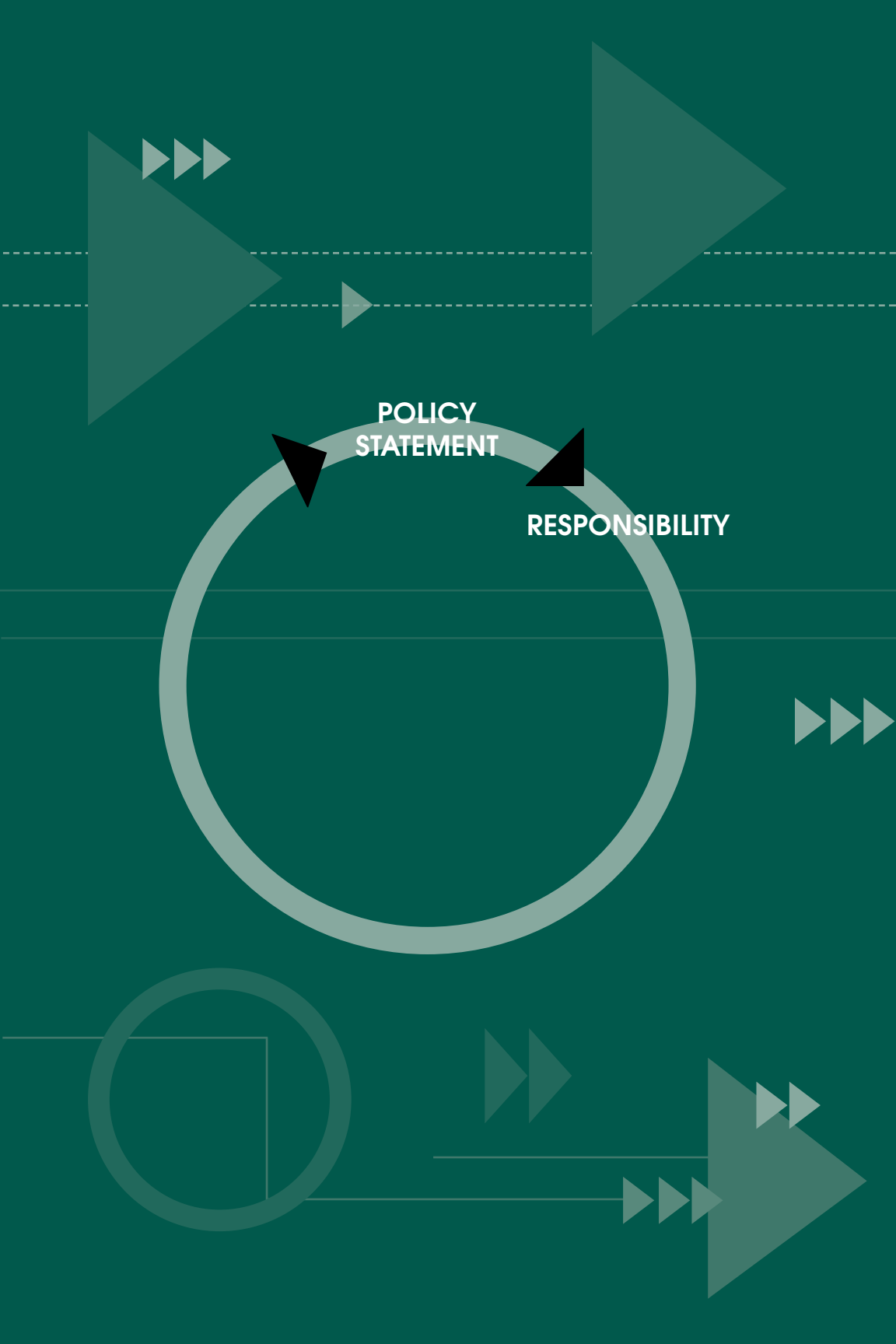


Tip



Remember





**POLICY
STATEMENT**

RESPONSIBILITY



Responsibility



1
ELEMENT



WHAT WE WANT...

Your WWSP must explain how the responsibilities for safety and health have been assigned to MANAGERS, SUPERVISORS, EMPLOYEES, and any other entities (such as safety committees) in your organization. This section should state who is responsible for specific activities within the program.

WHY?

Clear assignments of responsibility will allow each employee, supervisor, and manager to know what activities and behaviors are expected. This allows for clear communication rather than assumptions or misinterpretations of what needs to be completed. Further, without assigning clear lines of responsibility, you will not be able to establish accountability for the implementation of your program. What employees, supervisors, and managers are held accountable for is what normally will get accomplished in your operation. Be as specific as you can and then hold them to it. Use this as part of your performance appraisal process to evaluate employee effectiveness.

HOW TO DO IT...

Assess your current business activities, positions, and responsibilities. Make a list of all employees, showing date of hire, job description, and what experience and training each might have. List operations, activities, hazard controls, and training required.

Once you have these lists, decide who should be responsible for what, how they will do it, and how they will interact with others. Be specific and write it down! If position titles are used in the program for each item of responsibility rather than specific names, use a cover sheet with the specific names for each position title. Remember to update the names as changes are made.



Tip:

Include an organization chart showing lines of accountability!



Remember:

You must assign someone the responsibility to manage the safety and health program of your company. NRS 618.375.

Your responsibility section might look like this:

EXAMPLE 3: Responsibility Assignment

The President will:

- Promote a safe and healthy culture throughout the organization.
- Set a high standard for safety and health practices and lead by example.
- Ensure that the needed financial, material and personnel resources are provided to achieve the goals and objectives of the safety and health program.
- Ensure that the program is fully implemented and effective.

The Safety and Health Director will:

- Ensure the company's compliance with all applicable federal, state, and local safety and health requirements.
- Ensure that each employee is provided with adequate and appropriate occupational safety and health training.
- Ensure that the safety and health policies are comprehensive and effective.
- Review each accident and conduct any investigation wherein an accident has resulted in serious injury or property damage.
- Promote safety and health and serve as a resource to all staff.
- Review the program on an annual basis.

Each District Manager will:

- Ensure that each element of the program is implemented in his/her facility.

- Ensure that all Department managers, Division supervisors and Unit foreman comply with the program.

- Ensure that all required documents (including the OSHA Injury and Illness logs) are maintained.

Each Department Manager will:

- Ensure that safety/health surveys are conducted in his/her department on a regular basis, the frequency of which shall not be less than once per quarter.

- Ensure that each piece of equipment in his/her department is properly maintained.

- Ensure that each supervisor, foreman and employee in his/her department complies with the program.

Each Division Supervisor will:

- Ensure that each employee in his/her division receives appropriate training upon initial assignment changes in processes, procedures, equipment or assignments.
- Ensure that each foreman and employee in his/her division complies with the program.

Each Unit Foreman will:

- Ensure that each employee receives refresher training when required by law or whenever circumstances indicate the need for retraining.

- Conduct a daily safety and health inspection of his/her work area(s).

Each Employee without regard to position or station will:

- Be an active participant in the safety and health program.
- Perform all tasks in accordance with established policies, procedures and safe work practices.
- Perform a safety evaluation of his/her work-space daily.
- Inspect all tools and equipment prior to use to identify any hazards.
- Question any unsafe and unhealthy practice or condition, and act to correct and report it.
- Report any injuries, illnesses or incidents to the appropriate person.

The Safety Committee will:

- Promote safety and health by conducting a safety and health campaign each quarter.
- Encourage communication between employees and management.
- Serve as an oversight committee on all issues relative to safety and health.
- Make recommendations to the Safety and Health Director whenever appropriate but not less than once per quarter.



**POLICY
STATEMENT**

RESPONSIBILITY

**HAZARD ID,
ANALYSIS & CONTROL**



**Hazard ID,
Analysis &
Control**



2 ELEMENT



WHAT WE WANT...

Your written WWSP must explain how you intend to identify, analyze, and control new, existing, or potential hazards in your workplace. This should include the following: regular inspections of your facilities, review and analysis of high hazard operations, conducting accident investigations, analyzing injury trends, and taking action to eliminate future injuries. Be specific and identify who will be completing each activity, when they are to complete the activity, and how this will be evaluated for effectiveness.

WHY?

The Nevada Occupational Safety and Health Act requires all Nevada employers “furnish employment and a place of employment which are free from recognized hazards that are causing or are likely to cause death or serious physical harm to his employees”. That’s one big challenge! In order to fulfill this obligation you must have a plan! An effective hazard control program will be an invaluable tool in helping you to prevent accidents and injuries.

HOW TO DO IT...**1. Identify**

Before you can correct any hazards, you will first need to identify them. Make a list of all of your:

- Principal Operations and Locations
- Major Equipment
- Plant and Office Layouts

After you’ve made your list, the best way to find the hazards is to go and look for them! Conduct frequent workplace inspections to identify uncontrolled hazards. Your plan should identify who will conduct the inspections, how the individuals conducting inspections will be trained in hazard recognition, how often the inspections are to be completed, who will correct the hazards, and how this will be documented. This will define the responsibilities of identified individuals, the actual expected activity, and training.

**Caution:**

The person(s) to whom you assign the responsibility of conducting inspections must have training in hazard recognition.

**Remember:**

SCATS has consultants that can assist in identifying your hazards and also offers training programs on hazard recognition to help your employees become more proficient.

You can also use the following tools (among others) to help you to identify your workplace hazards:

- Employee Observations
- Exposure Monitoring
- Job Safety Analysis
- Accident/Injury Investigations

**Remember:**

Inspections need to be conducted on a continuous basis! We recommend that each area be inspected once per quarter at a minimum.

Note: The frequency of your inspections should be based on your activities and/or facility needs.

**Remember:**

Dangers can exist in any of the following four components of your operation. So be sure to evaluate all of these as you search for those hazards:

1. Materials
2. Equipment
3. People
4. Environment

E2

2. Analyze

Once your hazards and potential hazards have been identified, you will need to list the methods you intend to use to analyze them. Analyzing your hazards is an important step in reducing the potential for accidents as it will help you to use your resources more effectively when you begin to correct them.

Determine the severity and probability of each hazard. This can assist you to prioritize corrective actions.

Severity means “what type of damage or injuries would result if the accident does occur?”

- High: death, permanent disability or chronic/irreversible illness
- Medium: injuries or temporary, reversible illness resulting in hospitalization or temporary disability
- Low: injuries or temporary, reversible illness requiring only minor supportive treatment

Probability means “what is the likelihood that the accident will occur?”

- Greater
- Lesser

Each of these components should be evaluated independently. Once this has been done, you can combine the two components to determine the gravity of each hazard.

For example, a hazard with a high severity and a greater probability would have a higher gravity than one with a low severity and lesser probability. Confused? This should help...

SEVERITY	PROBABILITY	GRAVITY
HIGH	GREATER	GREATER
HIGH	LESSER	MODERATE
MEDIUM	GREATER	MODERATE
MEDIUM	LESSER	MODERATE
LOW	GREATER	MODERATE
LOW	LESSER	LOW

Again, this is merely one way to prioritize your hazards. You may already have a better system in place, so use what works for you.

Here are some other sources of information you may find useful in helping you to analyze your hazards:

- Loss Reports
- OSHA Injury and Illness Logs
- Accident Reports
- Incident or "Near Miss" Reports
- Employee Input
- Your personal observations
- Job Safety Analysis
- Inspection Reports

These sources of information can assist you with accident trend analysis. If there are accident trends, this can indicate poor accident investigation and corrective action or identify an area in which further evaluation and controls must be implemented. This may also include evaluating procedures and supervision. Accident trends alert you to take a second look and reevaluate to determine proper controls for hazards.

E2

3. Control

Now that the hazards have been pinpointed (identified) and characterized, it's time to get rid of them! If you can, why not completely eliminate the hazard(s)?

Can you...

- Change the entire process?
- Change your procedures?
- Use a different and/or less hazardous material?

If not, you must control the hazard(s) by the using one or more of the following:

- Engineering Controls such as guards, barricades, and ventilation systems.
- Administrative Controls like changing work schedules, assignments, or procedures. Generally, to control hazards the employees will need to be trained in hazard recognition and how to reduce their exposure. Examples of administrative and procedural controls include lockout/tagout procedures, hazard communication programs, exposure control plans, and confined space entry programs.
- Personal Protective Equipment (PPE) such as eye protection, hand protection, and respirators. PPE should always be used as a last option. Solutions should be sought in engineering or administrative controls first.



Tip:

Prompt correction of hazard(s) will increase employee trust!



Caution:

Failure to correct hazards after they have been identified is not only unwise, it could also result in higher penalties in the event of citations. An uncorrected identified hazard could result in a willful citation if discovered by an Occupational Safety and Health Enforcement Section (OSHE) compliance officer.

Your Hazard ID, Analysis, and Control section might look like this:

EXAMPLE 4: Hazard ID, Analysis, and Control

“We recognize that in order to maintain a safe and healthy working environment, we must be vigilant in our efforts to identify, analyze, and control any existing or potential hazards in our shop. The following shall serve as a guideline for our efforts.”

Identification:

Hazard identification shall be accomplished using the following means:

1. Safety/Health Inspections.
2. Employee Safety Hotline.
3. Reports of Safety Monitors.
4. Review of Records. (Hazard Bulletins, etc.)

The department supervisor will conduct inspections in their departments quarterly on the first Friday during the months of February, May, August, and November.

Hazards reported through the employee safety hotline will be sent to the corresponding department supervisors. The information from the hotline will not have employee’s names. The goal is to learn what the hazards are and to correct them. No one will take any adverse action against anyone for identifying a hazard.

The reports of the safety monitors will be sent to the safety committee and the plant manager.

The safety manager will evaluate the hazard bulletins and provide them to the department supervisors to be addressed at next department meeting.



Analysis:

We will use any means available to analyze hazards including:

1. Performing a job hazard analysis for each job description.
2. The use of area and personal environmental sampling.
3. Reviewing our policyholder statements.
4. A periodic review of accident investigation reports.
5. Trend analysis of our OSHA Injury and Illness log.

The safety manager will coordinate the hazard analysis effort.

The safety manager will review accident investigation reports to identify the need to improve training, evaluate if corrective action has been addressed, and determine that action has been taken to reduce injuries. Any problems identified may indicate a need to address the system, processes, and controls.

The safety manager will communicate results of the area and personal sampling to the employees and supervisors. The supervisors are to correct problems resulting in levels above acceptable limits. Any necessary action out of the supervisor's control will be directed to the plant manager and safety committee. Until the controls are in place, employees will be removed from the high exposure areas or provided with the appropriate personal protective equipment.

The department supervisors will conduct a job hazard analysis at least annually for each job classification in their departments and ensure they are up to date. This is to include a hazard assessment for personal protective equipment (PPE).

The safety manager and safety committee will evaluate accident trends from the policyholder statements and OSHA Injury and Illness log while ensuring the appropriate confidentiality. They will notify and work with the department managers to evaluate solutions and implement procedures or controls to reduce future injuries.

Control:

After a hazard has been analyzed, it must be given priority based on its overall gravity. Hazards will then be controlled thus:

1. Any hazard that can be eliminated will be.
2. All other hazards will be controlled by using engineering or administrative controls or a combination of these as appropriate.
3. The supervisors are to correct hazards within their control and ensure the remaining hazards are passed to the plant manager and safety committee for action.
4. The safety committee and plant manager will evaluate and implement controls for the hazards.
5. Administrative and work practice controls for hazards will be either designated as a separate program or part of our procedures. The following controls for hazards can be found in separate programs or procedures:
 - Chemical hazards: see Hazard Communication Program.
 - Fire, bomb threat, earthquake events: see Emergency Evacuation Procedure and Fire Prevention Plan.
 - Bloodborne pathogens exposure: see Awareness Training for all employees and Exposure Control Plan for those employees with specific exposure.
 - Energy source hazards: See Energy Control Program and Lockout/Tagout Procedure.
 - Use of respirators: See the Respiratory Program.
 - Noise hazards: See the Hearing Conservation Program.
 - Workplace Violence: See the Workplace Violence Program.
6. PPE will be used as a last option or as an interim measure.
7. The safety manager will monitor the progress of all abatement procedures and ensure that all effected employees are apprised of the status.
8. The safety manager will coordinate safety communication to vendors and subcontractors working within the plant.
9. The safety manager will provide to the Company President the status of implemented controls, controls pending action, and needed controls based on injuries, hazards, and regulations.



**POLICY
STATEMENT**

RESPONSIBILITY

**HAZARD ID,
ANALYSIS & CONTROL**

TRAINING



Training

3 ELEMENT

WHAT WE WANT...

You must establish a training program for your employees. Items to train your employees on include, but are not limited to: your safety program, their rights and responsibilities, and mandatory training based on the OSHA regulations and State of Nevada statutes. Your written safety program must include an explanation of your training policy and procedures. This should include who will do the training, when and how often training will be completed, a list of the training required for your activities, how the training lesson plan will be maintained, and how the training records will be maintained.

WHY?

Providing training to your staff and employees is a crucial part of having an effective safety and health program. In fact it may be the most crucial element. After all, a well-trained employee can be a much safer and more productive employee.

HOW TO DO IT...

You will need to answer the following questions in your procedure:

1. Who's responsible for the training program?

Specify this individual by their name, title, or both.

2. Who will provide the training?

You may find that some training can be conducted in-house. Other topics requiring special expertise will need to be contracted to an outside source. In either case, clearly identify the person or company who will conduct the training.

3. Who will be trained?

Your program will need to explain your procedures for providing training to the following people:

- New Employees
- Current Employees
- Temporary Employees
- Leased Employees
- Employees of Outside Contractors.

4. What will the employees be trained on?

All employees must be trained on the written workplace safety program and the rights and responsibilities pamphlet per Nevada law. Additionally, employees should be trained in the hazards of their operations and how to reduce the hazards. Training is to be conducted particularly in areas where there have been recurring injuries or where explosives are manufactured. All training programs, however, need to address the following basics:

- The specific policies and procedures contained in your written workplace safety/health program.
- The specific training requirements of any applicable regulation or statute.
- Your company's general safety rules.

Some companies find it easier to make a list of training required by topic and position title, while some companies find it best to have a training matrix developed. Other companies have a list of mandatory one time training and a second list of annual retraining topics. Since training is based on the hazards of your operation, each company will have different requirements to address. Working with your industry association may help you identify industry specific training needs.



Remember:

Every employer shall, upon hiring an employee, provide the employee with a document or videotape setting forth the rights and responsibilities of employers and employees to promote safety in the workplace. NRS 618.376.

Note: You can contact SCATS to obtain the document or videotape in either English or Spanish.

E3

TRAINING

5. When will training be conducted?

Training is a continuous process. Make sure that you develop procedures that address the various times and circumstances under which training is needed, including:

- Before initial assignment.
- Whenever processes, procedures, equipment, or materials are changed.
- Mandatory retraining which may differ for many regulations: annual, every three years, etc.
- When employee performance or behaviors indicate that additional training is needed.



Caution:

An employer who contracts with a temporary employment service shall provide specialized training concerning safety for the employees before they begin work at each site or as soon as possible thereafter. NRS 618.383.

6. What type of training will be provided?

Training can take many forms. You should decide which type of training is the most effective for your particular needs. Here's a partial list of your options:

- Formal ("Classroom" type training)
- Informal ("Tool Box" type training)
- Practical ("On-the-job" type training)
- CBT (Computer-based Training)

Each type of training has its advantages and limitations, so be sure to carefully evaluate your options. Formal training is good for the mandatory specific training; informal training such as construction tool box talks can help with hazard recognition and hazard changes as the job progresses; on-the-job training assists in procedural training; and computer-based training can help with awareness or regulatory training. The combination of these training activities can help your company develop an appropriate safety culture.



Remember:

Training must be conducted in a language and format the employees understand. NRS 618.383.



Caution:

Be sure to not confuse a "safety meeting" with training. Any training session, long or short, must have a specific purpose and be carefully planned.

7. Where will the training materials be maintained?

Many of the OSHA requirements mandate specific items to be covered in training. A lesson plan will assist the trainer in ensuring all the necessary items are covered; provide consistency in the training; and help concentrate on the specific policies, procedures, and hazards of your operation. Your procedure should ensure that training lesson plans are developed, used for each topic, identify how they will be updated, and indicate who is responsible for their maintenance.

E3

TRAINING

8. How will the training activities be evaluated?

You will need to determine a method to evaluate both the quality and effectiveness of your training activities. You may decide that tests and/or course evaluations are a good way to accomplish these objectives. Whatever you decide to do, remember, that this is a written program...so write it down!

9. How will the training records be maintained?

Remember that you will need to maintain documentation of the training that you conduct. The length of time that you will need to keep training records will vary depending upon the specific regulation that requires the records. However, the three-year retention period required by Nevada law must be adhered to as a minimum.



Tip:

Nevada law encourages employers who are required to establish a written safety program to include as a part of that program the employment of a person who has completed certain training in basic emergency care of persons in cardiac arrest that:

- included training in the operation and use of an automated external defibrillator; and
- was conducted in accordance with the standards of the American Heart Association or the American National Red Cross.

NRS 618.384



Tip:

Regardless of the format in which training is presented, what separates a good training session from a not-so-good training session is: Planning!

Your training section of your program might look like this one:

EXAMPLE 5: Training

1. Joe Scythe (owner) is responsible for conducting all formal safety and health training.
2. All employees will be trained prior to beginning work; the core training areas will include:
 - WWSP procedures and responsibilities
 - Emergency Action Plan
 - First Aid Procedures
 - Other Company Policies
3. The employee's supervisor will provide specific training relative to each employee per his/her job description.
 - Cook
 - Dishwasher
 - Cashier
 - Server
 - Maintenance
4. Retraining will be provided on an as required or needed basis.
5. Training records will be maintained in each employee's personnel file.

The specific outlines can be found in the training manual for each job description.



Remember:

Supervisors are employees too! All supervisors have safety responsibilities and many have never received any formal training in their safety responsibilities or requirements. SCATS has classes available to help supervisors better understand their responsibilities.

E3

TRAINING



**POLICY
STATEMENT**

RESPONSIBILITY

**HAZARD ID,
ANALYSIS & CONTROL**

TRAINING

**ACCIDENT
INVESTIGATION
AND CORRECTIVE
ACTION**



Accident
Investigation &
Corrective Action

4 ELEMENT



WHAT WE WANT...

Your program must explain how you intend to investigate accidents, and your procedures for ensuring that adequate corrective actions have been taken to correct any hazards and deficiencies that were identified during the investigation. Simply completing OSHA injury and illness recordkeeping forms or insurance injury report forms does not constitute an accident investigation.

WHY?

No one wants to have accidents. However, when one occurs we must learn why so that we may prevent recurrence. The idea is to find the root cause of the accident and implement corrective action so that the accident will not happen again.

HOW TO DO IT...**1. Accident Reporting**

In order to be able to investigate an accident you must first know that one has occurred. Thus, the first step must be to ensure that you have an efficient and clear accident reporting procedure. Be sure to explain who must do what and by when. Include both internal and external notification and reporting procedures.



Remember:

Have a plan or procedure to take care of the injured worker!

2. Accident Investigation

You will need to explain your accident investigation procedures:

- Who will conduct the accident investigation?
- How will the information be collected?
(Specify forms, etc.)
- What happens to the investigation report?

To investigate an accident properly, the following information must be obtained:

- Who was injured?
- Where or when did the injury occur?
- What was the injury?
- What part of the body was affected by the injury?
- What object, substance, exposure or bodily motion inflicted or contributed to the injury?
- How did the injured person come in contact with the source of injury?
- What hazardous condition or circumstance caused or permitted the occurrence?
- Where was the hazard?
- What unsafe act, if any, caused or permitted the occurrence of the event?

Generally, you will find direct, indirect, and root causes to any accident. The direct cause is the actual event or “unplanned release of energy or hazardous material.” The indirect causes maybe the unsafe act, unsafe condition or a combination of the two that can tie back to training, supervision or disciplinary action. The root cause is usually related to poor implementation of management policies, procedure, or decisions or it could be from personal or environmental factors.



Caution:

You may use OSHA injury and illness recordkeeping forms and insurance documents for accident investigations as long as you include corrective action taken and maintain medical confidentiality!

3. Corrective Action

After an accident has occurred, you will want to do everything within your power to see that it doesn't reoccur. You will need to develop procedures to promptly correct deficiencies and act on recommendations resulting from your accident investigations. Your accident investigation form should include not only suggested corrective action, but also what action was taken when.



Tip:

A tracking system should be devised to make certain corrective actions are taken in a timely manner. Also, corrective actions should be examined, after a time, to ensure that they are truly effective.

Your accident investigation should not be an attempt to assign blame. Remember the goal is fact finding, not fault finding.



Remember:

If you have an accident that results in a fatality or three or more persons being hospitalized, you must notify the enforcement section within eight hours of the occurrence.

Enforcement numbers:

(702) 486-9020 in Las Vegas

(775) 688-1380 in Reno

Your accident investigation section might look like this one:

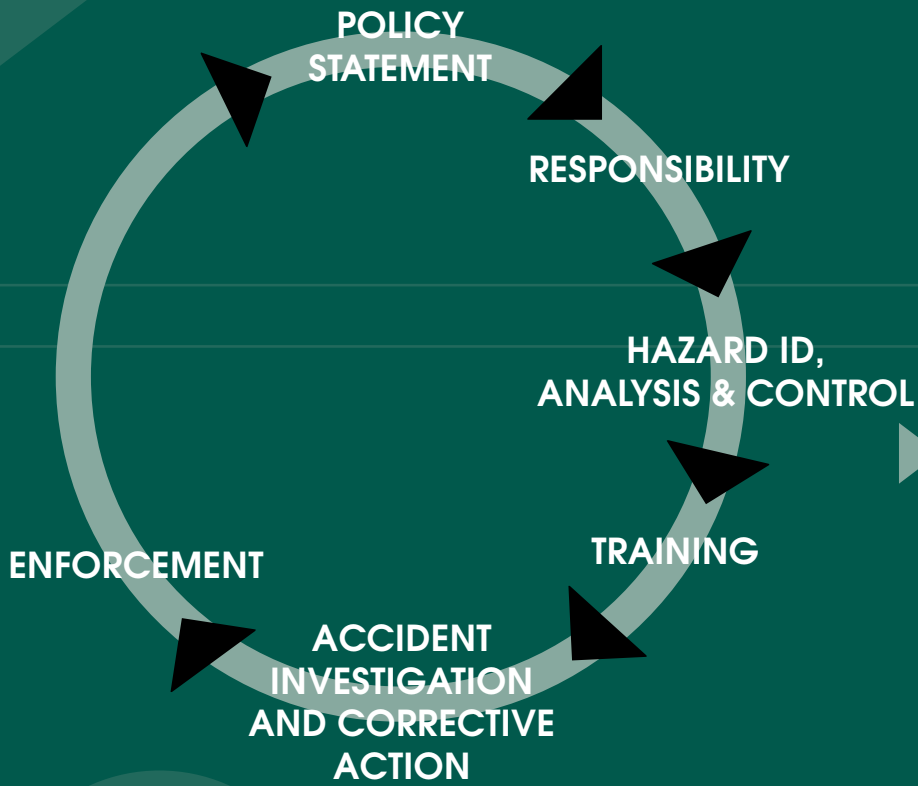
EXAMPLE 6: Accident Investigation & Corrective Action

SECTION IV

- (1) All on-the-job injuries and illnesses will be reported to the employees' supervisor as soon as practical after occurrence.
- (2) All accidents/incidents will be investigated by the security department.
 - (a) The officer conducting the investigation will complete an I-9 "investigation" form.
 - (i) Section K "accident summary" will be submitted to the safety committee for review.
 - (b) The supervisor of the injured will ensure that the appropriate worker's compensation forms are completed.
 - (c) The injured will complete an I-7 "statement" in addition to any other required documents.
 - (d) Corrective action will be initiated by the supervisor of the area involved.
 - (i) An I-10 "abatement log" will be used to track abatement action. The I-10 will be posted and updated weekly until all abatement is complete.

Note: If this type of system is used you will need to provide examples of the various forms for reference.

E4





**Enforcement
(Compliance)**



5 ELEMENT



WHAT WE WANT...

You are required to explain the methods by which you will ensure that employees comply with your safety rules and work practices.

WHY?

Your program will only be effective if all employees and managers are held accountable for their responsibilities and safety performance.

HOW TO DO IT...

Develop a clear procedure that explains:

1. Who will be responsible for disciplinary actions?

Front line supervisors may be the best choice for administering disciplinary action for minor violations. However, more serious disciplinary action may be reserved for upper level management.

2. What disciplinary actions will be taken?

Be sure that the 'punishment fits the crime'. It may not be appropriate to use a progressive disciplinary action where very serious infractions have occurred. Use your own judgement, but be sure that your policy is clear, and that all employees understand it and it is uniformly enforced.

3. Where will disciplinary records be maintained?

Wherever you decide to keep them, we recommend that you maintain these records for three (3) years.



Remember:

"You can catch more flies with honey..." Employees respond more favorably to positive reinforcement and your program may be more effective if you reward safe behavior.

Be careful to avoid gimmicks as they often cause more problems than they solve. Don't create an atmosphere in which injuries will go unreported because employees don't want to lose a 'perk'. True behavior modification requires careful research and planning. It's not easy, but it has proven to be worth it!



Tip:

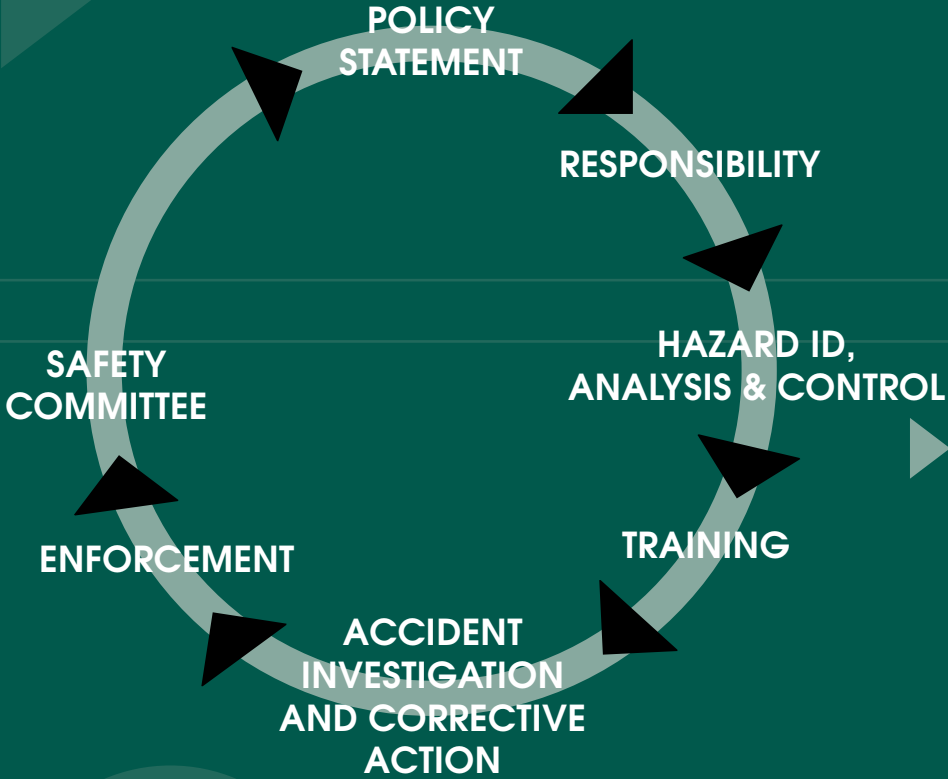
Be sure to enforce your disciplinary program fairly and consistently. Supervisors who allow employees to violate safety rules must be held accountable.

Your enforcement policy might look like this one:

EXAMPLE 7: Enforcement (Compliance)

1. Violations of safety rules and policies will be addressed in the following manner.
 - a. First incident: Verbal warning
 - b. Second incident: Written reprimand
 - c. Third incident: Written reprimand with one day suspension
 - d. Fourth incident: TERMINATION
2. Each supervisor will be responsible for administering this policy to his/her subordinates.
3. All records will be maintained in the employee's personnel files.

E5





Safety
Committee



6
ELEMENT



WHAT WE WANT...

If you have more than 25 employees or engage in the manufacture of explosives, you are required to have a safety committee. Even if you aren't required to have one...it's still a good idea!

WHY?

Safety committees are an extremely effective means of getting managers and employees to work together on safety and health issues.

HOW TO DO IT...

As discussed earlier, this is a performance standard, so you will decide which activities you assign to your safety committee. Make sure they match the assignments you have listed in your 'responsibilities' section. Also, be sure to:

- Describe the manner in which the committee members will be selected.
- Define and list the duties and purpose of the safety committee.
- Determine the frequency of the safety committees meetings.
- Provide training to the members of the safety committee.
- Explain how, where, and by whom, records will be maintained.

Safety committee members can be assigned by management, voted on (mandatory if represented by labor organization) by employees, or selected from volunteers. Some companies find volunteers to be the most active, while other companies will rotate all employees through the committee to advance their knowledge. Decide what works best for your business!

**Remember:**

The safety committee should have an equal number of management and employee representatives. If the employees are represented by a labor organization, then the employees' representatives must be selected by the employees. The terms of the committee members should be staggered in order to provide continuity to the committee.

**Tip:**

Your safety committee will function more efficiently if your meetings have codes of conduct. You may want to try Robert's Rules of Order

The purpose and duties of the safety committee will vary based on the needs of the operation and change as the program changes. Make sure your program is updated as necessary.

The purpose of a safety committee might be to:

- Evaluate accident trends and suggest needed improvements and alternative solutions.
- Evaluate department inspection reports verifying corrective action was taken and identifying trends requiring further research or assigning individuals to complete the research for input in the evaluation.
- Audit the safety program and verify proper implementation.
- Serve as a secondary source for employees to submit hazards without the fear of reprisal.
- Evaluate training sources for improved staff knowledge of safety and health.
- Promote safety activities.
- Develop a safety newsletter, bulletins, or posters.
- Conduct inspections.
- Combination of the above or others, but be specific in your program to give guidance.

E6

Safety committee members should be trained in how to work on a committee, Roberts Rules of Order or other committee system being used, how to conduct inspections and recognize hazards, how to evaluate accident trends, accident investigation techniques, and available safety and health resources within the company and the local area. The duties should be specific as to what action members are to take to meet the purpose of the committee.

The meeting frequency and dates should be identified to ensure on-going activities. However, safety committees should meet at least quarterly.



Caution:

If the safety committee conducts accident trends or investigations, ensure that the confidentiality controls are in place.



Remember:

The safety committee should grow with your company. Construction companies may have core people on the committee and add employees and supervisors as they grow.

Your safety committee might operate like this one:

EXAMPLE 8: Safety Committee

Safety Committee

I. Mission:

To foster open and on-going communication and cooperation between employees and management on all issues relative to safety and health.

II. Membership:

The safety committee will consist of one manager and one employee representative from each department.

- A. Management representatives will be appointed by the board of directors.
- B. Employee delegates will be elected from a general election of their peers.
- C. The Safety Director will serve as the chairperson of the safety committee.

III. Responsibilities:

The safety committee will:

- A. Hold meetings as prescribed in section IV of this chapter.
- B. Periodically review and update existing work practices.
- C. Develop quarterly safety and health awareness campaigns.
- D. Conduct an annual comprehensive workplace safety and health inspection.
- E. Compile and distribute an annual report on hazards found in the facility.

IV. Meetings:

- A. The safety committee will meet on the second Friday of each month unless otherwise announced.

V. Meeting Rules:

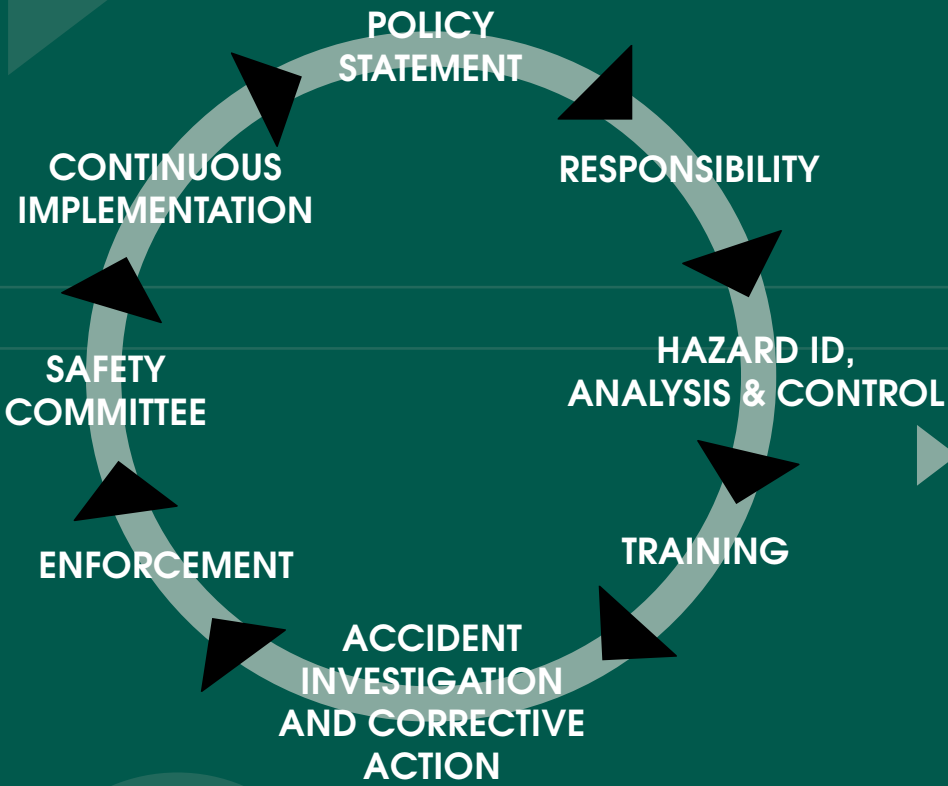
- A. All meetings will be governed in accordance with "Robert's Rules of Order".
- B. A quorum will consist of three (3) management representatives and three (3) employee delegates.

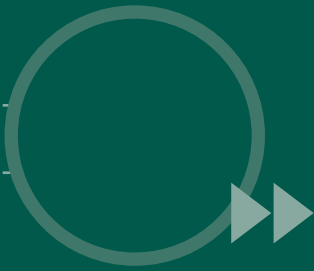
VI. Records

Records from all safety committee meetings will be handled as follows:

- A. Minutes of all committee meetings will be drafted by the secretary.
- B. The original minutes will be forwarded to and retained by the Safety Director for a period not less than five (5) years.
- C. Copies of minutes of all safety committee meetings will be:
 - 1. Posted on the employee bulletin board in the cafeteria.
 - 2. Sent to each safety committee member and manager and supervisor.
 - 3. Forwarded to the board of directors.

E6





Implementing Your Program



Now that you've written the program, it must be implemented.

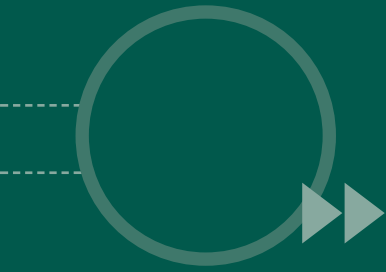
You've taken the first step...it's all carefully planned and written down! It's now time to put the program into practice. The heart of your program revolves around two unwritten features: employee involvement and continuous improvement of the program.



Remember:

Your program should reflect what you are doing...not what you would like to do! It should not reflect what you did in the past that is no longer being done!





Other
Requirements



A WORD ABOUT OTHER REQUIREMENTS (OR, HOW DO MY OTHER PROGRAMS FIT IN?):

With the aid of this guide and other resources that are available to you, you should be able to write a program that meets or exceeds the requirements of NRS 618.383. However, you must consider other laws and statutes with which you must comply. Nevada enforces the federal OSHA standards found in 29 CFR 1910 and 29 CFR 1926. These are also known as the General Industry and Construction Standards, respectively. Each of these has general and specific requirements that may apply to your operation. Many of these standards require their own written program.

Some of these include but are not limited to the following:

- Hazard Communication Program (HAZCOM)
- Emergency Action Plan
- Fire Prevention Plan
- Energy Control Program and Procedures (Lockout/Tagout)
- Respirator Program
- Confined Space Program
- Exposure Control Plan (Bloodborne Pathogens Program)
- Fall Protection
- Chemical Hygiene Plan (Laboratory Safety Program)
- Hazardous Waste Operations and Emergency Response (HAZWOPER)
- Process Safety Management
- Other (Check appropriate standards)

Other programs, procedures or systems that are commonly required:

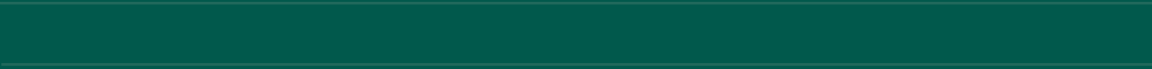
- Hot Work Permits
- Line Breaking Permits
- Injury and Illness Recording
- First Aid Protocol
- Hearing Conservation Program
- Personal Protective Equipment
- Safety-Related Work Practices (Electrical)
- Environmental Monitoring/Sampling
- Fire Watch
- Fire Brigade



Caution:

As the employer, it is your responsibility to know and comply with the applicable standards. Failure to do so can result in citations in the event of an enforcement inspection!





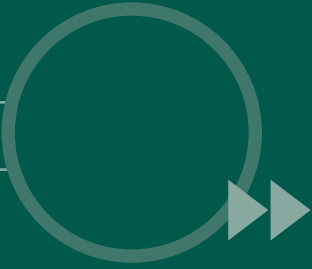
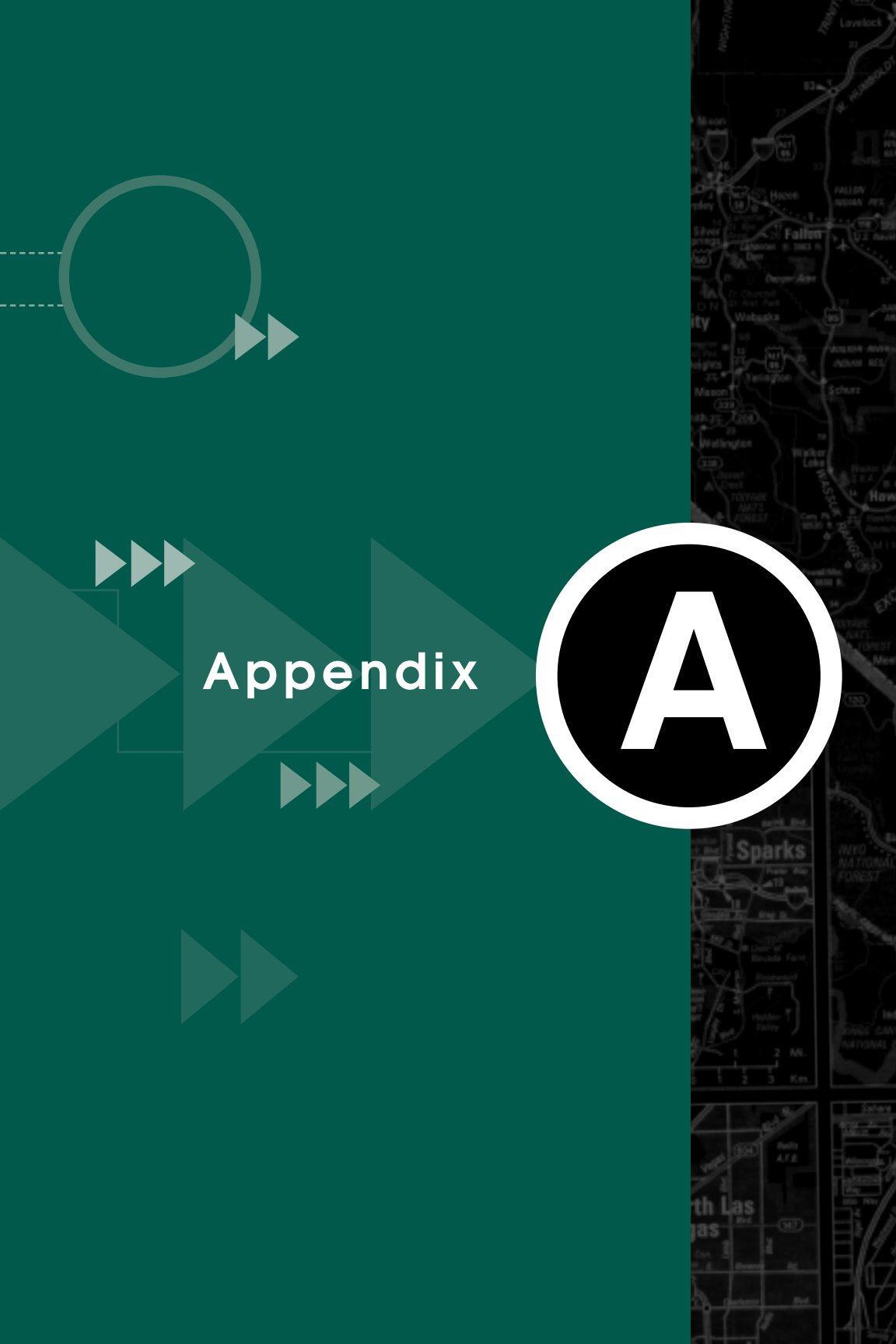


Frequently
Asked Questions





- Q.** Must I establish a written workplace safety program?
- A.** Yes, if you are a Nevada employer with 11 or more employees or your employees are engaged in the manufacture of explosives. It's the law!
- Q.** How can I find out if my safety program complies with Nevada law...and with good safety practices?
- A.** SCATS offers assistance in the development of your written safety and health program at no cost. We also offer an assessment of your existing programs to see if they meet Nevada's requirements.
- Q.** What is the cost to train my managers and employees on workplace safety?
- A.** Nothing. Our services are provided at no additional cost to you.
- Q.** What other materials on workplace safety are available to me?
- A.** You can receive at no additional cost to you:
- OSHA General Industry and Construction Standards
 - Nevada Occupational Safety and Health Act
 - Regulations for the Nevada Occupational Safety and Health Enforcement Program
 - Nevada Written Workplace Safety Program Guide
 - Access to the Safety and Health Video Lending Library
- Q.** Are on-site consultations available for my business?
- A.** Yes. We'll gladly meet with you to make sure that your business complies with all necessary safety and health requirements.
- Q.** How can I receive more information on setting up a safety and health program for my company?
- A.** Call SCATS at 1-877-4SAFENV or visit any of our offices.



Appendix



NEVADA REVISED STATUTE AND NEVADA ADMINISTRATIVE CODE

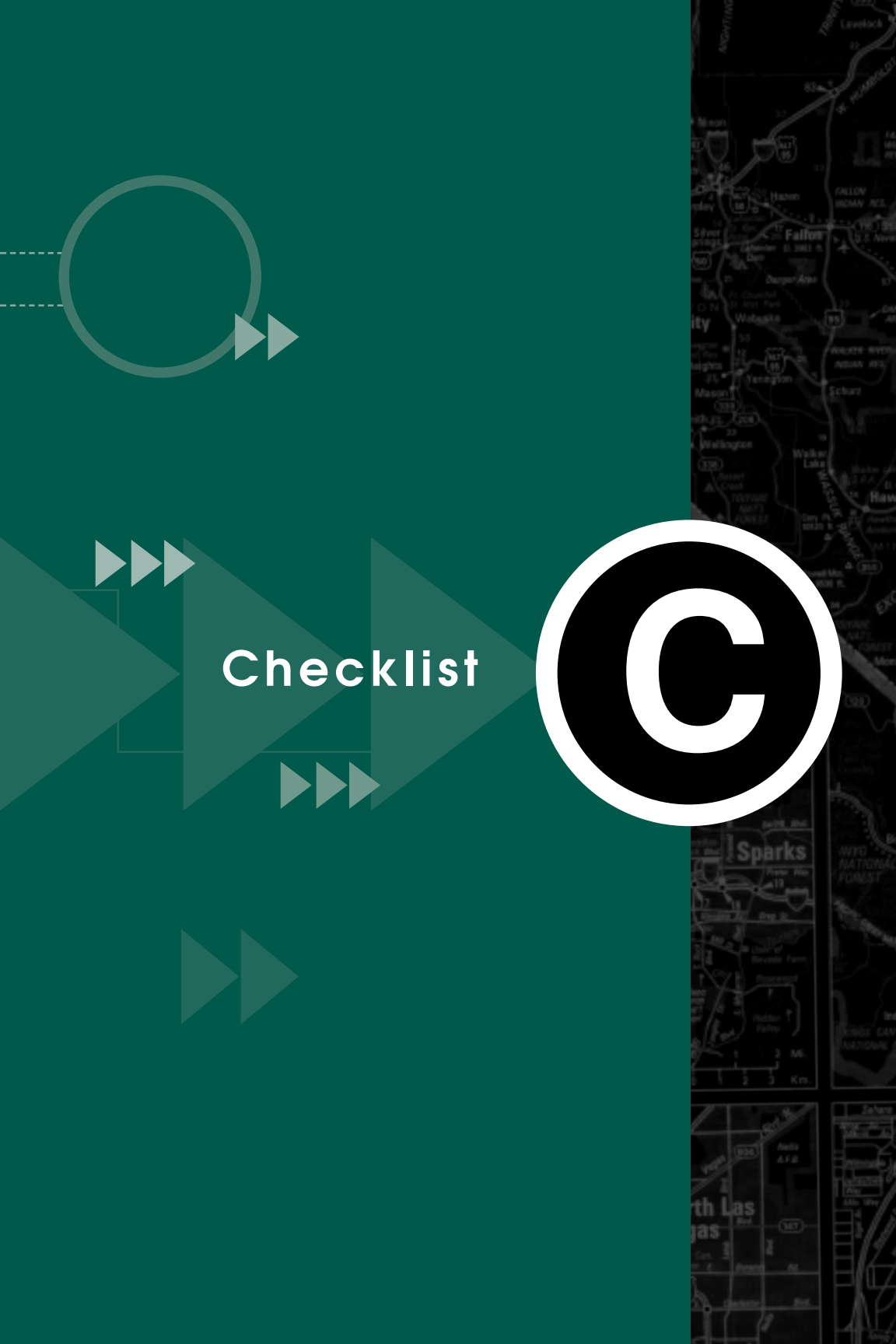
The State of Nevada is a State run OSHA program. The requirements for Nevada are specified in Chapter 618 of the Nevada Revised Statutes and further clarified in the relating sections of the Nevada Administrative Codes.

Per NRS 618.295(8), Nevada adopts "all federal occupational safety and health standards which the Secretary of Labor promulgates, modifies or revokes, and any amendments thereto...unless the division adopts regulations establishing alternative standards that provide protection equal to the protection provided by those federal occupational safety and health standards." Regulations Nevada adopts can be found in the Nevada Revised Statutes (NRS) and the Nevada Administrative Codes (NAC)

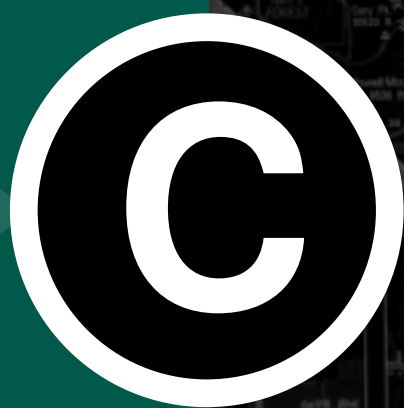
The Nevada Revised Statute (NRS) and the Nevada Administrative Codes can be obtained from the following websites:

- www.4safenv.state.nv.us
- www.leg.state.nv.us/law1.htm

Note: The websites use the terms 'NRS' and 'NAC' rather than spelling out Nevada Revised Statutes and Nevada Administrative Code.



Checklist



Following is a sample of the checklist that a consultation and/or enforcement staff member may use during a visit. This is for informational purposes to review your written safety program only.

Employer _____

Address _____

No. of employees at establishment _____ Total in Nevada _____

Type of Business _____ SIC Code _____

Date _____ Safety Specialist/IH _____

Please answer the following with Yes, No, or N/A

_____ Does the employer have a Written Workplace Safety Program?

_____ Does the employer have 11 or more employees?

_____ Do the employer's employees engage in the manufacture of explosives?

A

Element 1. Identifying Responsibilities:

A statement explaining that the managers, supervisors and employees are responsible for carrying out the program. Ref: NAC 618.540.

_____ Does the written program include a policy statement about safety in the workplace?

_____ Is the policy statement signed by the employer?

_____ Has the responsibility for management of the occupational safety and health program been assigned?

Ref: NRS 618.375.

Name and Title _____

_____ Is safety communicated as everyone’s responsibility?

_____ Have adequate responsibilities for managers, supervisors, and employees been assigned?

_____ Does the program include an explanation of how managers, supervisors and employees are responsible for implementing the written safety program and how the continued participation of each will be established, measured & maintained?

_____ Does the program provide for adequate resources and support (people, time, money, and authority) for those assigned the responsibility for program implementation?

_____ Have employees signed the “Rights and Responsibilities” document? Ref: NRS 618.376.

Comments: _____



A

Element 2. Identifying, Analyzing and Controlling Hazards:

An explanation of the methods used to identify, analyze and control new and existing hazardous conditions. Ref: NAC 618.540.

_____ Has the responsibility for conducting inspections been assigned? Ref: NAC 618.540.

_____ Are work sites analyzed to determine high hazard areas?

_____ Are safety inspections scheduled for all work sites?

Who conducts the inspections? _____

_____ Has the frequency of inspections been established and does the frequency of inspections correlate with the hazard potentials?

What is the frequency of inspections? _____

How are records of inspections maintained? _____

_____ Is there a procedure for correcting identified hazards?

_____ Is there a procedure for follow-up on corrective actions?

_____ Is there a procedure for providing for employee input with regard to hazards and other safety concerns?

_____ Does the procedure ensure that employees may make this input without fear of reprisal?

Comments: _____

Element 3. Establishing a Training Program:

Specify procedures for training employees that will be used to comply with NRS 618.383. Ref: NAC 618.540.

_____ Has the responsibility for development and implementation of the safety and health training program been assigned? Ref: NAC 618.540.

_____ Is there a procedure to provide training for each employee concerning individual job assignments and identified hazards?

_____ Is there an appropriate list of training topics specific to each job, particularly in those areas where there have been recurring injuries?

_____ Have training lesson plans been established for each training topic?

_____ Is there a procedure to provide training for new employees before they begin work? Does this procedure address leased employees?

_____ Is there a procedure to provide specialized safety training for temporary employees before they begin work or before any exposure to hazards?

_____ Is there a procedure to provide training for outside contractors before they begin work?

_____ Is there a procedure to provide training for employees affected by new tasks or operations?

_____ Is there a procedure for follow-up training?

_____ Is the training conducted in a language and format the employees understand? Ref: NRS 618.383.

_____ Is there a procedure for documenting training and maintaining training records for three years? Ref: NAC 618.542.

Comments: _____



Element 4. Accident Investigation and Corrective Action:

The procedures that must be followed to investigate an accident which has occurred and the corrective actions that are to be initiated. Ref: NAC 618.540.

_____ Is there a policy or procedure for rendering first aid?

_____ Is there a procedure for transporting employees who need professional or advanced medical treatment?

_____ Is there a procedure for the timely reporting of injuries?

_____ Is there a procedure for investigating all accidents, incidents, and near misses involving either employees or property?

_____ Has the responsibility for accident investigation been assigned? Ref: NAC 618.540.

Who is responsible for investigating accidents? _____

_____ Does the procedure for investigating accidents and incidents address the identification of corrective action?

_____ Are there procedures for follow-up and closure of all identified corrective actions resulting from accident investigation recommendations?

_____ Is there a procedure for documenting and maintaining accident records?

_____ Is there a procedure that addresses the required forms that must be filled out for the worker's compensation insurance carrier?

Comments: _____

Element 5. Enforcing Safety Practices:

A method for ensuring that employees comply with the safety rules and work practices. Ref: NAC 618.540.

_____ Are appropriate safety rules included in the program?

_____ Has the responsibility for administering disciplinary action been assigned?

_____ Are managers, supervisors, and employees held equally accountable for compliance with safety policies and regulations and for accomplishment of assigned safety program responsibilities?

_____ Does the program provide for progressive discipline for those who violate safety policies?

_____ Is there a procedure for documenting and maintaining records of disciplinary action?

_____ Is there a form of positive reinforcement for individuals who comply with safe work practices or procedures?

Comments: _____



A

Element 6. Safety Committee:

An employer with more than 25 employees, or an employer who has employees engaged in the manufacture of explosives is required to establish a safety committee and shall include in the written safety program:

- (a) The manner in which members of the committee are selected.
 - (b) The purpose and duties of the committee.
 - (c) The frequency of the meetings of the committee.
- Ref: NAC 618.540.

____ Are the purpose and duties of the safety committee specified?

How are the members of the safety committee selected?

The safety committee has ____ management representatives and ____ employee representatives.

____ Has the frequency for safety committee meetings been established?

What is the frequency? _____

____ Are there provisions established to train the safety committee members?

____ Does the program contain provisions for documentation and maintenance of records of safety committee meetings and activities for at least three years?

____ Have procedures been established to assure that the minutes or results of the safety committee meetings are communicated to the employees?

How is the information discussed in the safety committee meetings communicated to other employees?

Comments: _____

Other required written programs:

Some of these include but are not limited to the following:

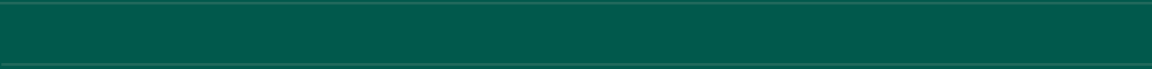
- Hazard Communication Program (HAZCOM)
- Emergency Action Plan
- Fire Prevention Plan
- Energy Control Program and Procedures (Lockout/Tagout)
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- Confined Space Program
- Exposure Control Plan (Bloodborne Pathogens Program)
- Fall Protection
- Chemical Hygiene Plan (Laboratory Safety Program)
- Hazardous Waste Operations and Emergency Response (HAZWOPER)
- Process Safety Management
- Other (Check appropriate standards)

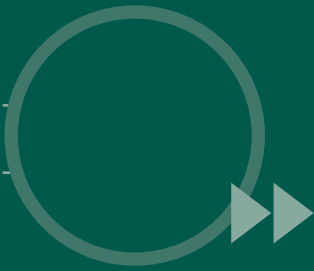
Other programs, procedures, or systems that are commonly required:

- Hot Work Permits
- Line Breaking Permits
- OSHA Injury and Illness Recording
- First Aid Protocol
- Hearing Conservation Program
- Personal Protective Equipment
- Safety-Related Work Practices (Electrical)
- Environmental Monitoring/Sampling
- Fire Watch
- Fire Brigade
- Workplace Violence
- Other (Refer to the appropriate standards)

Comments: _____







Information & Resources





Your Partner for a Safer Nevada

This guide is intended to assist you in complying with Nevada Revised Statute 618.383 and is not intended to replace or augment the requirements of the law. For specific information concerning your legal responsibilities, please contact the following offices of the Safety Consultation and Training Section, Division of Industrial Relations, Nevada Department of Business and Industry:

Las Vegas Office

1301 N. Green Valley Pkwy., Suite 200
Henderson, Nevada 89074
Telephone: (702) 486-9140
Fax: (702) 990-0362

Reno Office

4600 Kietzke Lane, Suite E-144
Reno, Nevada 89502
Telephone: (775) 688-1474
Fax: (775) 688-1478

Elko Office

350 West Silver Street, Suite 210
Elko, Nevada 89801
Telephone: (775) 778-3312
Fax: (775) 778-3412

Or call, toll free

877-4SAFENV (472-3368)

Or, visit our Internet site. We are continually adding to our website in an effort to provide a better service for you.

www.4safenv.state.nv.us

Other services provided by the Safety Consultation and Training Section include:

- Recognition and correction of hazards through on-site surveys;
- Interpretation and applicability of OSHA regulations;
- Assistance or advice for specific safety and health problems in the workplace;
- Training programs in good safety and health practices for workers; and
- Safety and Health Achievement Recognition Program (SHARP).

To file a complaint or referral or to report a fatality or catastrophe, please contact the following offices of the Department of Business and Industry, Division of Industrial Relations and Occupational Safety and Health Enforcement Section.

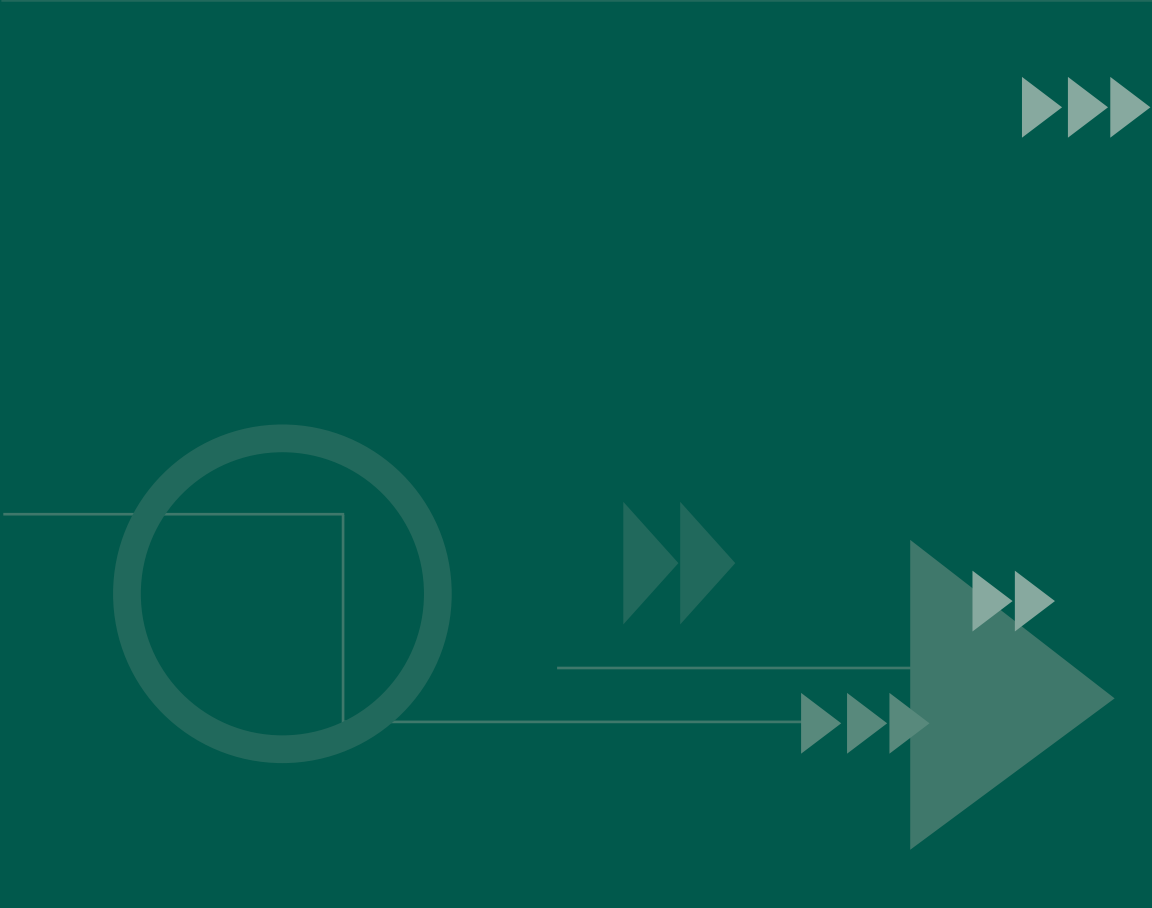
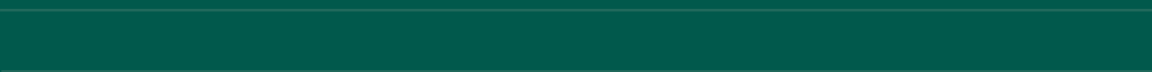
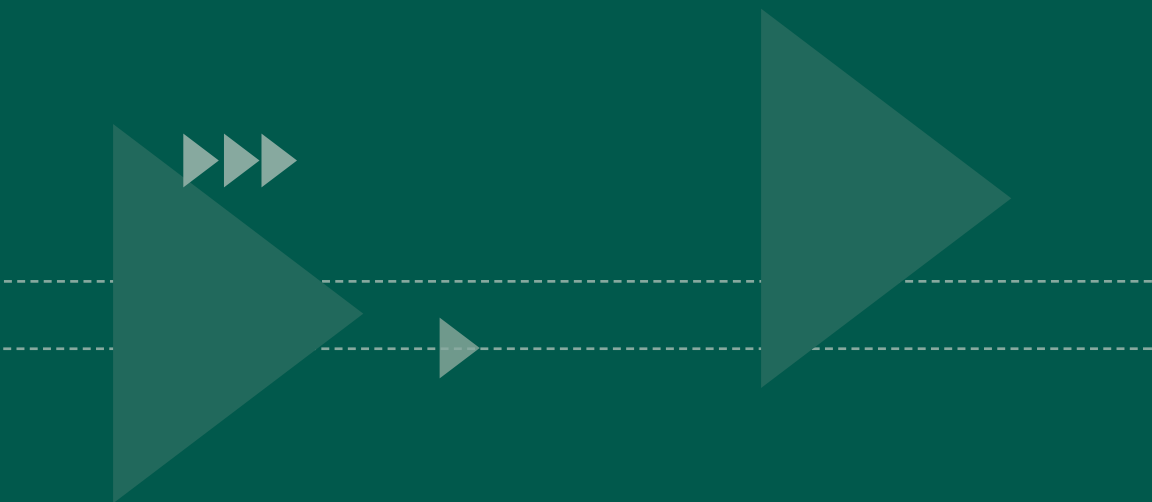
Southern Nevada

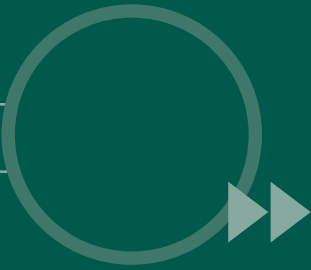
1301 N. Green Valley Pkwy., Suite 200
Henderson, Nevada 89074
Telephone: (702) 486-9020
Fax: (702) 990-0358

Northern Nevada

4600 Kietzke Lane, Suite F-153
Reno, Nevada 89502
Telephone: (775) 688-1380
Fax: (775) 688-1378







Services Response Form





Please complete and mail or fax the following service request form to your nearest Safety Consultation and Training Section office.

Would you like a consultant to contact you for further assistance?
Yes No

If yes, please provide a name and phone number below.

Would you like us to mail or fax the training schedule?
Yes No

If yes, please provide a name and address or fax number below.

Did you find this guide useful? Yes No If not, why?

Was the information presented in a clear and concise manner?
Yes No

If not, what suggestions would you make? _____

What changes would you suggest for the next revision? _____

What additional information would you like now and where can we send it? _____

Company name: _____

Name: _____

Address: _____

City, State, Zip: _____

Phone number: _____

Fax number: _____

e-mail: _____

What other formats would you suggest for receiving this type of information?

- Video CD Rom Internet e-mail

PLEASE CUT ALONG THE DOTTED LINE.



Southern Nevada
1301 N. Green Valley Parkway, Suite 200
Henderson, Nevada 89074
Ph: (702) 486-9140
Fax: (702) 990-0362

Northern Nevada
4600 Kietzke Lane, Suite E-144
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Fax: (775) 688-1478

Northeastern Nevada
350 West Silver Street, Suite 210
Elko, Nevada 89801
Ph: (775) 778-3312
Fax: (775) 778-3412

Or call, toll-free
877-4SAFENV (472-3368)

www.4safenv.state.nv.us