

Safety and Health Program

for



CNR Insurance Inc

## TABLE OF CONTENTS

INTRODUCTION	Page 1
STATEMENT OF POLICY	2
ASSIGNMENT OF RESPONSIBILITY	4
SAFETY PLANNING, RULES AND WORK PROCEDURES 7	
INCENTIVE PROGRAMS	8
DISCIPLINARY ACTIONS	9
TRAINING/ONGOING EDUCATION	11

## INTRODUCTION

This manual is designed to help you in the formation and preparation of an effective safety and health program. **SAFETY IS NO ACCIDENT** - it requires initiative, teamwork, and an overall awareness from the top executive to the newest employee. Commitment and enthusiasm are vital to the success of this program. After all, no policy can achieve its maximum potential without full support.

Why develop a safety and health program? Taking risks is a part of running a business. You take risks in product development, marketing, and advertising in order to stay competitive. In the history of America, this pioneering, risk-taking attitude has always been applauded. But there are some risks that are just not worth the gamble. One of these is risking the safety and health of those who work for you.

Most business owners have come to realize that the actual cost of a lost workday injury is much more than the dollar amount spent on medical bills. For every dollar you spend on the direct cost of an injury or illness, you'll spend much more to cover the indirect and hidden costs. For example, what would one lost workday injury cost you in such areas as?

- ◆ Productive time lost by the injured person.
- ◆ Productive time lost by employees and supervisors attending the accident victim.
- ◆ Time to hire and train another individual to fill in for the injured employee until his or her return to work.
- ◆ Time and costs for repair or replacement of any damaged equipment or materials.
- ◆ Reduced morale among the other workers, and perhaps lower efficiency.
- ◆ Increased workers compensation insurance costs.

As you can see, there are many additional costs associated with a workplace accident or injury. One way to help reduce these costs effectively, is the formation of a workplace safety and health program.

This manual describes a foundation for building such a safety and health program, one that you can tailor to meet the specific features and needs of your organization.

The manual consists of this first section, which describes each section of a safety and health program. It explains why each of the sections is important and interrelates with each other. This should serve as a guide for you to develop your own safety and health program.

The next section is an example of a safety and health program written for a typical type of business, which Erie insures. The program you write may be somewhat smaller or larger than this but should follow the same basic format.

At any time throughout the process of developing your safety and health program, please feel free to call on your Loss Control Consultant for assistance.

Once this program is in place, you will have an effective tool for improving workplace operations, controlling hazards, reducing accidents and injuries, and increasing production.

## **STATEMENT OF POLICY**

Commitment to a safe and healthy work environment starts at the top. Your safety and health policy statement is your best opportunity for setting workplace standards; that is, developing your goals and objectives for workplace safety and health and communicating them to your employees.

Executive management must provide the means as well as the positive attitude to make this program successful. The policy statement should outline the company's philosophy of providing a safe and healthful work environment. It should be signed by the key executive officer.

Here are some points to keep in mind as you formulate your policy statement.

- ◆ Post the statement in conspicuous places where all employees can see it.
- ◆ Make sure management support is "visible".
- ◆ Meet with employees to communicate and support the policy.
- ◆ Make sure everyone follows the safety rules, including all management personnel.
- ◆ Have a means for employee input, such as a suggestion box, and act on the ideas presented by your employees.

An example of a policy statement is included in this module. If this statement fully explains your thoughts on this subject, you are free to reprint it on your letterhead. However, you should make your statement specific to the type of safety and health program you will be implementing.

# Safety Policy Statement

## TO ALL EMPLOYEES:

The management of \_\_\_\_\_ realizes that safety and loss prevention are essential to employee welfare and morale and to good public relations.

With this concept in mind, your management has decided to establish a comprehensive safety and health program integrated within all departments and at all levels of activity.

This program will be formulated and administered through a cooperative effort of the Safety Director and a Safety Committee, which will be appointed in the near future. The function of this committee will be to advise on the elimination or control of hazards, potential loss cause conditions, and to help establish safe procedures and administer the authorized safety program.

It is our intent to comply with all local, state, and federal safety standards, codes, and regulations. We expect everyone in the organization to perform their job in a safe manner and in accordance with the procedures outlined in our safety program.

The real success of this program depends upon you, our employees. In order to insure the safest working conditions for all, everyone must take an interest in strengthening the program and extending wholehearted cooperation.

---

President

## ASSIGNMENT OF RESPONSIBILITY

Once you have made the commitment to having a safety and health program, you must decide who is the most appropriate person to manage the program. In many companies, the owner is the only likely candidate. In larger companies, the plant manager or other ranking member of the management team could be considered. Whoever you choose for the position of safety director, it should be a person who is committed to workplace safety and health. The Safety Director position may or may not be a full time job. This will depend on the size and structure of your organization.

The Safety Director must be given the time to devote to developing and managing the program, and must be willing to take the responsibility for the operation of the program. Because you will be holding the safety director accountable for the operation of the program, he must also be given the authority to make decisions affecting the program. A key element in any safety program is measuring program effectiveness. Senior Management and the Safety Director should develop a means to measure the effectiveness of the program.

You should consider the establishment of a Workplace Safety Committee to help promote and manage the program. This is a group generally comprised of an equal number of people from management and workers formed to aid and advise both management and employees on matters of safety and health. The basic function of such a committee is to foster and maintain a general interest in safety and health among employees and management and thereby to reduce accidents and injuries on the job. There have been some limits placed on Safety Committee activities by State and Federal regulations. Collective Bargaining agreements also have some bearing on Safety Committee activities. Before establishing a safety committee, you should consult your attorney and bargaining unit for assistance.

This section identifies and discusses each person or groups responsibility within the overall safety and health program. Since it is vital that employees understand what is expected of them, a copy of these obligations should be given to and discussed with them. At that time, the consequences of violation should be thoroughly explained to all of the employees. (Refer to "Disciplinary Actions").

Remember that upper management can establish all the safety policies, procedures, and goals it wants, but the primary responsibility for maintaining safety and health in any work environment comes down to the workers themselves. This is why it is vital for everyone from top management on down to the individual worker to develop a conscious awareness of safety. The discussion on the assignment of responsibility is an excellent time to create this awareness.

Some examples of assignment of responsibility are shown below.

### TOP MANAGEMENT

- ◆ Issue a statement of policy signed by the owner, president or chief executive officer.
- ◆ Provide guidance and direction to the overall program by active participation and

involvement.

- ◆ Appoint a Safety Director to administer the program.
- ◆ Instill a high level of accountability for job responsibilities and safety issues.
- ◆ Review safety performance and make necessary adjustments to facilitate improvement.
- ◆ Publish general and specific safety rules and regulations for plant operations for distribution to all employees.
- ◆ Provides final approval on all safety and health policies formulated by the safety director.
- ◆ Ensure that the Safety Director and other levels of management are held accountable for their specific areas of responsibility.

#### SAFETY DIRECTOR

- ◆ Administer the safety and health program in accordance with management's goals and objectives.
- ◆ Ensures that all accidents and illnesses are recorded and reported to the Erie via the Claims Department local toll free number. Also, makes certain that they are recorded on the OSHA logs.
- ◆ Heads the accident investigation team, and sees that all accidents are promptly and thoroughly investigated for cause and possible solutions.
- ◆ Develops and implements the job-site safety inspection program, in coordination with Management's directives and / or the Safety Committee.
- ◆ Coordinates the training sessions, meetings, and educational activities for all employees. Ensures that all formal training is documented.
- ◆ Acts as a source of information for supervisors, foremen, and other employees on all safety and health related issues, as well as federal and state standards and codes.
- ◆ Provides a report annually or as directed to upper management showing the safety trends over the past period.

#### SUPERVISORS AND FOREMEN

- ◆ Conduct a daily inspection of the worksite to verify compliance with the company safety and health policy.

- ◆ Takes primary responsibility for the safety of the people under their control. Maintains a safe and healthy working environment and insists that all safety rules be followed.
- ◆ Ensures that all required Personal Protective Equipment required is available in good condition and being properly used.
- ◆ Guides the weekly "shop talks" and also instructs employees regarding different jobs, processes, materials, or hazards present.
- ◆ Ensures that prompt treatment is given for any injuries or illnesses in the workplace.
- ◆ Assists in the investigation of all accidents and injuries, and takes action to prevent a reoccurrence.
- ◆ Sets a good example for the employees by exhibiting safe work practices and a good safety attitude.
- ◆ Determines that all employees in the department are familiar with and understand company and department safety rules and procedures.

#### SAFETY COMMITTEE

- ◆ Evaluate the safety and health program and make recommendations for improvement.
- ◆ Establish procedures for periodic workplace reviews by the safety committee for the purpose of locating and identifying safety and health hazards. Make recommendations to management on ways to correct or protect against any hazards found.
- ◆ Responsible for the evaluation of implemented safety solutions for effectiveness.
- ◆ The Safety Committee should be actively involved in the integration of new equipment and/or procedures. Additionally, follow-up evaluations of any newly implemented safety equipment or safety and health procedures should be done.
- ◆ Timely review of incidents resulting in work related deaths, injuries and illnesses and complaints regarding safety and health hazards by committee members or other employees.

#### EMPLOYEES

- ◆ Adhere to all general rules of society. Practice good sanitary health habits. Provide

assistance to your co-workers when necessary.

- ◆ Work in accordance with the established safety and health rules.
- ◆ Report unsafe work conditions or actions to the foreman immediately.
- ◆ Use all required personal protective equipment correctly in accordance with training. Provide normal maintenance as necessary.
- ◆ Cooperates during any accident investigation and assists if requested.
- ◆ Actively participates in the safety and health program.

### **SAFETY PLANNING, RULES and WORK PROCEDURES**

Planning for safety and health includes the development of general safety and health rules which apply to everyone, as well as safe and healthful work practices or procedures for each specific job that is done by your employees.

The development of safe and healthful work procedures takes your safety and health goals and translates them into specific actions that will lead to increased workplace protection. These procedures state step by step what has to be done both to accomplish a task and to do it in a manner that meets your standards. Safety rules should discuss activities, practices and behavior that are and are not expected on the job.

Writing out clear and concise safety and health rules and procedures is the most effective way to set standards for safety and health, and to maintain a record of your expectations in case any questions arise. To gain the greatest degree of effectiveness, the rules should be written, posted in the workplace, given to all employees affected by them, and discussed with the employees. Everyone, from top management to the individual worker must observe these rules - **NO EXCEPTIONS!**

The following Safety Rules generally apply to all companies. You should develop rules and procedures that are tailored specifically for the needs of your company. When writing the safety rules and procedures for your company, you should be certain that they are clear, concise, and easily understood by your employees.

- ◆ The drinking of alcoholic beverages or the taking of non-prescription drugs of any kind during working hours, or reporting to work under their influence is prohibited.
- ◆ An employee shall operate only the equipment or machinery they have been trained and authorized to operate safely. Do not operate, adjust, or repair machines or equipment unless authorized to do so.
- ◆ Smoking is permitted only in those areas posted. Use proper receptacles when disposing of smoking materials.

- ◆ Follow the established safe job procedures. You are to perform only those jobs you have been assigned and properly instructed to perform.
- ◆ Wear the protective equipment required for your job as established by your supervisor through job instruction. Safety equipment such as safety glasses, shields, safety shoes, etc., shall be used whenever the operation or job requires them. It is your responsibility to see that protective equipment is kept in good repair. Damaged equipment should be reported to your supervisor immediately.
- ◆ Report unsafe acts or unsafe conditions to your supervisor without delay.
- ◆ Report all accidents to your supervisor immediately whether anyone is hurt or not. In cases of injury, get first aid as soon as possible.
- ◆ Keep all mechanical safeguards in position during operation.
- ◆ Horseplay, such as scuffling, practical jokes, or throwing articles at each other will not be tolerated.
- ◆ No employee is permitted to make repairs on any electrical device or equipment unless authorized to do so. Electrical equipment is not to be tampered with in any way.
- ◆ All employees are requested to walk - not run while they are within the work area.
- ◆ Fire extinguishers, sprinklers or fire exits are not to be blocked by supplies, stock or parts at any time.
- ◆ Only the First Aid Department or specifically authorized personnel will administer first aid. Under no circumstances shall any employee attempt to remove foreign objects from the eyes or ears of a fellow employee.
- ◆ When lifting heavy objects:
  - A. Maintain proper balance. Keep elbows close to the body.
  - B. If the load is too heavy to handle safely, get some help.

Employees who violate these safety guidelines may be subject to disciplinary action.

## **INCENTIVE PROGRAMS**

Incentive programs are an excellent, but controversial tool to promote safety. They are designed to promote safe attitudes and to stir up enthusiasm about your company's safety efforts. Instituting such a plan may have many benefits, including:

- ◆ Increased safety awareness.

- ◆ Reduction in accident, injury, and workers compensation rates.
- ◆ Better employer/employee relationship.
- ◆ Positive reinforcement of good safety performance.
- ◆ Builds employee interest and motivation toward safety.

All of these assets lead to higher productivity, a safer workplace, and an increased bottom line for the company. These programs can be tailored to fit any company's specific needs. No matter how it is developed, the approach must be fair and consistent.

## **DISCIPLINARY ACTIONS**

Safety rules are of little value unless there is a means of enforcing them. A disciplinary system can help you to establish a workplace where procedures are clearly spelled out, where employees know what's expected of them, and where both employees and supervisors know that you are serious enough about safety and health to take disciplinary action when and if it's warranted.

The primary purpose of a disciplinary system is not to punish your employees, but rather to control the work environment so that workers are protected and accidents do not happen. A disciplinary system works along with other elements of your safety and health program such as hazard control procedures to maintain a high level of workplace protection and accident prevention. It lets your workers know how you expect them to operate in relation to the goals you have set for the safety and health program, and what actions you will take if they do not meet your expectations.

### **Communication**

One way to show employees the link between your safety rules and the consequences of breaking them is to go over the list of rules, as well as the disciplinary procedures that will be taken for breaking the rules. You should then ask them to sign a statement that shows that they understand both the rules and the consequences. Both the employee and the employer should keep a copy of this signed statement.

Having a disciplinary system in place in case serious problems occur is a good idea, but many problems can be corrected by establishing an open climate for communication and discussing problem areas with your employees and supervisors as soon as they come up. Responding to and correcting minor problems relating to safety and health can help to prevent those problems from becoming major.

### **Employee Involvement**

Employees can contribute greatly to the success of a disciplinary system. They often are involved in the informal system of peer enforcement. Without asking them to spy on the other employees, you can encourage them to watch out for the safety and health protection of their fellow workers. They should also be encouraged to tell someone when they spot a problem that can easily be corrected, such as reminding a co-worker to use the appropriate personal protective equipment.

Employee involvement can also give employees an opportunity to correct their own behavior problems. Once a problem is spotted, it should be discussed with the employee, and he or she should be given a chance to change the behavior. At this time, you should assess the need for some retraining. Only after the employee has been given the necessary help and the chance to correct the problem, should disciplinary action be taken?

### **Consistency**

When setting disciplinary actions, it is important to be fair, thorough, and consistent. The action taken needs to be appropriate to the seriousness of the problem and the frequency with which it occurs. If your disciplinary system is to work well and be accepted by all of your employees, it needs to be applied equally to all. There should not be any favoritism shown in the enforcement policy. Also, all levels of management should be subject to the same rules and regulations as the employees.

One key to ensuring fairness and consistency is to keep records of all corrective actions taken. Documentation of good or poor safety behavior should be kept in the employee's personnel file. In this way, employees will know what problems need corrected, and you will be able to track the effectiveness of the disciplinary program. This will also provide the documentation needed in the event that an employee's safety performance does not improve and he or she must be discharged.

### **Appropriate Actions**

You may find it useful to make a list of the kinds of safety and health rule violations, which you would consider unacceptable. You should then rank these as being minor, moderate, or severe. You then need to link each type of offense to an appropriate corrective action. Your goal is to make sure that the corrective actions are fair to all employees. The following example illustrates how various types of violations can be directly linked to corrective actions.

Verbal or Written Warning	No Safety Glasses Horseplay Unsafe Work Habits Other Violation
Suspension without Pay	Three or More Violations of the Same Type. Refusal to Follow Safety Guidelines or Instructions.
Termination	Excessive and Repeated Safety Violations.

Possible Immediate Termination    Unsafe Actions that Jeopardize the Safety of Others.  
General Disregard for the Safety of oneself and others.

Many Disciplinary Programs use corrective procedures that involve three or more steps. An example of a four-step program follows.

First Violation	Verbal Warning, Note for the Personnel File, Instruction in Proper Procedures.
Second Violation	Written Warning, Copy for the Personnel File, Retraining.
Third Violation	Written Warning, One-Day Suspension without Pay.
Fourth Violation	Written Warning, One-Week Suspension Without Pay, or Termination if Warranted.

After you have developed your list of safety and health violations and linked them with the appropriate corrective action, you or your supervisors should meet with your employees to go over the system with them. This meeting should be positive in nature, so that they understand that you are concerned with their health and safety. It should also let them know that you are trying to protect them against the unsafe acts of others, and to make the workplace as safe and healthful as possible.

## TRAINING/ONGOING EDUCATION

Before you can hold someone accountable for actions or behaviors, you have to tell him or her what you expect. This is done through training and supervision. Training sessions must be conducted:

- ◆ At the time of hiring.
- ◆ As required by a particular standard.
- ◆ When new equipment or processes are introduced into the workplace.
- ◆ When employees do not exhibit knowledge of a subject matter, or when an accident or incident is determined to have been caused by a lack of training.

Training that will reduce the need for disciplinary action includes instruction on the importance of workplace safety and health, the need to develop safety habits, safe operation procedures and the hazards they control, and the standards of behavior you expect in the workplace. Of course,

it also includes specific instructions for the type of jobs the employee will be required to perform.

Employees who have been trained on safe operating procedures and the hazards they control are more likely to see how following those procedures is in their own best interest. This helps with the development of a strong safety oriented mentality, and decreases the need for application of the disciplinary process.

Safety is an ongoing process. Initial safety training provides new employees with a door to your safety program. Ongoing education and training allows existing employees to refresh their memories and learn about new or updated safety standards and procedures.

In order to provide proper documentation, often required by OSHA, a record should be kept for each employee showing the date of training, topic discussed, and the instructor's name. This should be made a part of the employee's permanent record. Please see the attached sample training attendance log.

#### New Employee Orientation (What to Cover on Employees first Day)

1. **Emergency Procedures.** Explain your company's emergency procedures, location of fire extinguishers, alarm activation, location of phones, loud speakers, evacuation plans, including where to meet, head counts, etc. Explain what is expected of them and their job in any emergency situations.
2. **Explain Safety Rules for Company.** Show them where they are located. Outline company policy on enforcement of rules. Make sure the new employee understands that violating safety rules can not only injure the worker but also could cause injury to fellow workers and subject the employee to disciplinary actions.
3. **Mechanical Safety.** Explain the normal operating procedures for all machines the new employee is required to operate. The new employee should also be trained in the maintenance procedures he/she will be allowed/expected to perform and procedures for notifying maintenance or authorized maintenance for those situations where more extensive maintenance is required. Company LOCK-OUT/TAGOUT procedures should also be explained.
4. **Protective Equipment** Explain proper use and wear of required PPE. Explain company policy on wear of personal clothing jewelry. Maintenance and cleaning procedures should be covered in detail. If Respiratory Protection Equipment is required, explain company Respiratory Protection Program to include Health Monitoring Requirements.
5. **HAZCOM:** Explain the companies' HAZCOM policy, Location of MSDS sheets, along with any emergency equipment such as Eyewash and Emergency Shower locations. Discuss any potentially hazardous chemicals or materials the worker may encounter, explain the requirement to read and follow all label instructions. Accidental Spill instructions should also be covered if applicable.

6. **ACCIDENT/INCIDENT REPORTING:** Procedures for notifying management after accident/injury. Companies participating in ERIEComp should explain the company's use of Preferred Physician Panels and the employee's responsibilities for notification and communication of their status.
  
7. **HOUSEKEEPING AND MAINTENANCE PROCEDURES:** Explain how housekeeping contributes to the companies basic safety program. Explain their responsibilities to keeping common areas clean and sanitary.
  
8. **EMPLOYEE TRAINING AND SAFETY COMMITTEE PARTICIPATION:** Explain that training and participation in company safety programs is very important and should be taken seriously. Employee actions and attitudes are part of the companies' evaluation process for promotions, raises and bonuses.



## TRAINING GUIDELINES

Many hazards can be eliminated or controlled through engineering or process changes. For those hazards not eliminated, proper guarding, personal protective equipment, and training is necessary. Problems that can be dealt with effectively through training include:

- ◆ Lack of knowledge of a job process.
- ◆ Unfamiliarity with equipment.
- ◆ Incorrect execution of a task.

The next step is to determine what training is needed. This can be done by conducting a job analysis, (Job Safety Analysis) which pinpoints what an employee needs to know.

Once the training needs have been established, you should prepare objectives that you would like to accomplish with the training. Instructional objectives should describe the preferred practice or skill in sufficient detail, and its observable behavior so that other qualified persons, such as your supervisors, can recognize when the desired behavior is exhibited.

The next step is to determine the type of learning activities that will be incorporated into the training. This will depend on the resources you have available, and the kind of skills or knowledge that needs to be learned. No matter what the method, the learning activities should be developed in such a way that the employees will be able to clearly demonstrate the skills or knowledge they have acquired.

Now that all of the preparation is done, the next step is to conduct the training. Some general suggestions for employee formal training include:

- ◆ The training should be done by someone who is knowledgeable about the subject, and is familiar with your workplace.
- ◆ Make sure that instruction is done in a language, which all your employees understand. Use interpreters as needed.
- ◆ Whenever possible, schedule short training sessions, rather than one long session. This will help to keep the interest of the employees.
- ◆ Use audio-visual aids, actual workplace conditions, and your own, or your employees experiences when possible.
- ◆ Provide time for a question and answer sessions.
- ◆ Verify how effective the training is by using oral or written exams, skill demonstrations, and observation of the employees work habits after the training.

The final steps are to evaluate the training program effectiveness to see if it is accomplishing the goal you have set, and then to make any necessary changes in order to improve the program. Some forms of evaluation include student opinion, supervisor's observations, and workplace improvements. Among the questions you can ask are:

- ◆ Were there any parts of the program that were unnecessary because they were already well known?
- ◆ Was any of the material confusing or distracting?
- ◆ Were there any parts that were missing?
- ◆ What did the employees learn, and what did they fail to learn?

A thorough, critical examination of the training process will help you to make the necessary changes in order to make the program more effective. It will also help you to determine how often the training needs to be done or how often re-training will be required.

The formal training process should be reinforced on a weekly basis through a series of informal "shop talks". These are brief meetings of about five minutes conducted in each department, generally by the supervisor, that focus on the important points of a single, specific topic.

Through this whole process, you should remember that training is as important to your total safety and health program as management commitment, hazard analysis, or safety planning, rules, and work procedures.

Not all training involves formal "classroom" teaching. Most employees receive "on the job" training to one extent or another. This training is usually accomplished by a supervisor or highly trained experienced employee who explains and demonstrates each required task, then observes the new employee performing the task. A method should be developed similar to a "sign off sheet" to document when the new employee is judged proficient in a task. Providing new employees with job checklists are often very good training devices to ensure that all job steps are taken in proper order. All informal training should be documented in the workers file. Workers should only perform unsupervised, those tasks that they have been trained for.