

STARTING YOUR HEALTH AND SAFETY PROGRAM

Introduction

Workplace injuries and illnesses can be prevented. The key to achieving safe production is to identify and control all workplace health and safety hazards.

Employee health and safety are integral to productivity. A management system that integrates health and safety activities into all aspects of the company's operations will help achieve positive results in productivity, quality and, above all, the health and safety of employees.

This guideline highlights some critical health and safety program activities.

Health and Safety Policy

Ontario's Occupational Health and Safety Act (OHSA) requires employers to prepare, and review at least annually, a written occupational health and safety policy, and to develop and maintain a program to implement that policy (s.25 (j)).

A policy statement, signed by your company president and dated, should contain references to the following points:

- the importance of the health and safety of all employees
- compliance with health and safety legislation
- objectives of your health and safety program, and the fact that program activities are integrated into all functional operations
- the responsibilities of everyone in your company

Your policy will be the foundation of your workplace health and safety program. You must post it prominently in your workplace, where it will

come to the attention of all employees. You should promote it by other means as well.

Experience shows that the clearly demonstrated commitment of senior managers to workplace health and safety has a positive influence on employee attitudes. Your written policy, backed by a sound program, is a way to establish this commitment.

Responsibilities

Each person in a company, no matter what his or her function, has some responsibility for health and safety. Assign responsibilities, set these out in writing to ensure that they are understood, and hold the appropriate persons accountable.

General Responsibilities

Make sure that each member of your management team accepts responsibility for health and safety in his or her area.

Line managers' responsibilities may include the following:

- identify and control hazards
- ensure that work practices and procedures are understood and observed
- train employees
- investigate all accidents to determine the causes, and what corrective action is needed
- maintain equipment, machinery, tools, etc., in good working condition
- conduct regular health and safety inspections

Make sure that workers understand their responsibilities.

These include the following:

- comply with safety rules, work practices, and procedures
- use protective devices and safety equipment properly
- report all hazards to their supervisors
- report all accidents immediately

Functional Responsibilities

Identify the specific health and safety responsibilities related to major functions within your company, and hold the appropriate managers accountable. Some examples are:

Policy Setting

- Ensure that an occupational health and safety policy exists

Finance

- Allocate funds to implement the overall health and safety aspects of your operation

Human Resources

- Identify the “essential” requirements for all jobs
- Assess the physical demands of all occupations, and develop selection tests
- Match the physical requirements of work with the physical capabilities of individuals, taking human rights considerations into account

Purchasing

- Obtain health and safety information from suppliers
- Include safety and health specifications when purchasing machinery, equipment and materials

Health and Safety Coordinator

Although health and safety is primarily a line management responsibility, both large and small firms can benefit greatly from a staff person who devotes as much time as needed to health and safety.

See Appendix 1 for information on the function and responsibilities of health and safety coordinators.

Joint Health and Safety Committees or Health and Safety Representatives

Under *OHSA*, you must have a joint health and safety committee if you employ 20 or more workers (s.9 (2)). Your committee as a whole has certain powers and functions; worker members of your committee have specific duties and rights relating, for example, to hazard identification, workplace inspections and accident investigations. Workers and management must select one of their committee members to be certified members, who have certain additional powers and functions.

If you employ from 6 to 19 workers, you must have a health and safety representative elected by the workers (s.8 (1)). Representatives have functions and rights similar to those of committees.

See Appendix 2 for more information.

Working Conditions Assessment

A sound knowledge and evaluation of all workplace conditions is the basis for controlling health and safety hazards. Regularly assess workplace conditions. Thorough periodic workplace inspections are necessary to ensure safe workplace conditions and, consequently, safe production.

Also assess the impact of any proposed changes in process, equipment or materials.

Assess all solvents, raw materials, and other chemicals for potential hazards. Ensure that material safety data sheets (MSDSs) are obtained

from suppliers and that all containers of hazardous materials are properly labelled.

Identify all processes that have the potential to generate fumes, gases, mists, dusts and vapours, noise and heat or cold.

Rate all identified hazards based on severity (high, medium or low), frequency (number of workers exposed, how often and for how long) and probability of injury or loss. This will enable you to establish a priority for the action needed to eliminate or minimize hazards. A **Workplace Hazard Assessment Form** may be used for this purpose.

Hazard Control

Control is best achieved by engineering controls (e.g., removal/elimination of a hazard) and administrative systems (e.g., job rotation, etc.). Take into account all relevant regulations and codes (e.g., machine guarding, noise control, hazardous materials control, the Ontario Fire Code), any applicable standards, manufacturers' specifications and industry codes of practice.

Integrate safe working practices into all jobs or operating procedures. Draw up a set of general health and safety rules to be followed by all employees. Keep these to a minimum, communicate them clearly, and they will have a better chance of being understood by everyone.

Personal Protective Equipment (PPE)

In an emergency or where controls fail, the use of personal protective equipment will offer protection against or reduce the effects of an accident. Use surveys and records to determine areas of need. Ensure that equipment meets established standards. Provide training in the selection, use, care and

limitations of the equipment.

Health Care Program

Provide first aid facilities, including a staff person trained in first aid, in accordance with the First Aid Regulation 1101 of the Workplace Safety and Insurance Act. Also consider pre-placement medical and regular medical tests when required by regulations under OHSA (s.26(1)(h)(i)).

Communications

Management's involvement, interest, concern and belief in the workplace health and safety program must be demonstrated and clearly communicated to everyone. It must be quite clear to your supervisors that production cannot compromise safety.

Employees must not be placed in a situation where there is conflict between safety and production. Use personal contacts, group meetings, job training and positive behaviour reinforcement to encourage safe operations.

Training

Under OHSA, you have a legal responsibility to provide information, instruction and supervision to protect the health and safety of workers (s.26 (1)(l)).

Train all workers so that they know and understand:

- how to recognize hazards and associated risks
- the safety procedures and precautions they have to follow
- their legal responsibilities

Studies indicate that workers in the first months of their employment are involved in a disproportionate number of accidents. It is also safe to assume that damaged goods, lost time, rework and other loss-producing incidents occur with higher frequency

during the early months of employment. This is a clear indication of the need for adequate health and safety orientation of new employees.

You must also ensure that supervisors are competent when appointed, that is, that they have knowledge of the work, of OHSA and the regulations that apply to the work, and of potential and actual dangers to health and safety in the workplace (s.1(1)). Training for supervisors is equally important.

If supervisors are to accept responsibility for training in proper work practices, you must ensure that they have the expertise and support to carry out this training.

A supervisor's ability to train others can be a most valuable asset; every supervisor should become thoroughly familiar with training techniques. Ultimately, success as a manager depends on the knowledge and skill of people receiving this training.

Your health and safety coordinator, your joint committee members or health and safety representative, and managers with special responsibilities should all receive appropriate training to enable them to carry out their functions. Certified members must receive the required training.

Measurement and Evaluation

Establish standards for all your program activities and identify the data needed to measure performance against these standards. Measure for compliance with standards, as well as, the effectiveness of the standard. Collect and analyze the data on a periodic basis, and evaluate the results to pinpoint deficiencies and make corrections or improvements as needed.

Monthly analyses of your accident investigation reports (see Appendix 3 for guidelines on

developing accident investigation procedures) and a recording system for workplace injuries and illnesses (see Appendix 4 for more information) will help to spotlight weaknesses in your overall health and safety program. This will also enable you to meet your legal duty to review your policy annually and update your health and safety program (s.25(2)(j)).

Appendix 1

Health and Safety Coordinator

The basic function of a health and safety coordinator is to act as an advisor on health, safety and accident prevention to all levels of management.

Responsibilities

A coordinator's functions and duties should include the following:

- develop recommendations to improve overall health and safety operations
- assist senior management in the preparation and review of the workplace health and safety policy
- assist management to develop practices for integrating health and safety into all business operations
- collect and disseminate health and safety information including legal requirements
- develop procedures for identifying hazards, for example, procedures for workplace inspections
- assist all levels of management to develop procedures and company safety rules
- assist department supervisors to develop safe work practices
- coordinate program activities
- assist production and engineering personnel to appraise new and relocated equipment, machines and new substances
- ensure that there is an effective fire protection program, direct fire prevention activities and fire drills, and inspect fire protection equipment and facilities

- arrange for the selection, testing, repair and maintenance of all types of safety devices and personal protective equipment
- ensure that a proper accident investigation procedure is developed (see Appendix 3)
- ensure regular analyses of all relevant injury reports and records (see Appendix 4)
- coordinate the measurement and evaluation of program activities and of the overall health and safety program
- cooperate with the health and safety committee
- develop and maintain co-operation with experts in various fields
- liaise with federal and provincial authorities and with organizations such as WSPS

The coordinator performs an extremely important function and should report to a senior manager.

Appendix 2

Health and Safety Committees and Representatives

Joint committees are an excellent forum for constructive and regular dialogue between managers and workers about health and safety concerns in the workplace. The committee or your representative should be involved in the development and implementation of the workplace health and safety program. These committees and representatives provide advice to the employer and help to build the internal responsibility system.

Research has shown that joint committees work best under the following circumstances:

- The goals, functions and roles of the committee are clearly established and understood
- There is careful time control - Enough time is allowed to get the work done
- There is good preparation for meetings. The agenda and information are prepared and

distributed prior to meetings

- Good minutes are kept and followed up
- The committee takes time to review and evaluate its performance
- Individual members are suitably qualified and interested
- Members feel that they are given some form of recognition for their efforts

Employers must respond, in writing, to the written recommendations of the committee or representative within 21 days (s.9 (20)). Assign responsibility for ensuring that recommendations are considered and replied to promptly.

Appendix 3

Accident Investigation

The purpose of an investigation is to determine the causes of the accident so that steps can be taken to prevent a recurrence (IER, s.5).

The first person to investigate an accident should be the supervisor of the area in which it occurred. Some accidents may need to be investigated by a team that includes persons with special technical knowledge or expertise. A designated worker health and safety committee member or the health and safety representative is required to investigate accidents resulting in fatalities or critical injuries.

Procedures for investigating accidents should specify who is responsible for conducting accidents, to whom reports are to be submitted, and whose responsibility it is to ensure corrective action is taken. Use a standard form to record the results, such as an Investigation Report form. Details to be recorded include the machinery or equipment involved, a description of the injuries, and the circumstances of the accident

The investigator should gather relevant information through inspections and discussions with personnel involved. A clear description of exactly what happened and of the circumstances leading up to the accident should then be written.

In the initial stage of the investigation, the questions asked will usually identify the immediate causes of the accident, namely, those substandard practices and/or conditions that resulted in or contributed to the accident. These questions may include:

- Was the work authorized?
- Did a machine failure occur?
- Was the machinery involved properly guarded?
- Were the people involved adequately trained?
- Was there adequate lighting?

The immediate causes, however, are symptoms of a deeper problem. Determine the basic causes of the accident by asking the question “Why did the substandard practices or conditions exist? The “basic causes” will invariably stem from a lack of management control. A thorough investigation will reveal the defects in the management system that allowed the accident to happen, that is, the not so obvious causes.

Appendix 4 Injury and Illness Records

There are a number of injury and illness records that employers are required to keep. Analyses of these will help to spotlight weaknesses in your overall system or program and to indicate changes that are necessary for a safer, healthier and more efficient operation.

Regulations under the Workplace Safety and Insurance Act require you to record each and every personal injury “arising out of and in the course of employment” that your employees may suffer (First Aid Requirements Regulation 1101 s.5).

Record all first-aid cases. When the injury is serious enough that the employee must visit a doctor, you must complete and forward Form 7 (accident report) to the Workplace Safety and Insurance Board. The recording and reporting of certain accidents is also required (OHSA s.51 and 52).

Analyses of these various records will help pinpoint the need for revised procedures, equipment modifications, protective equipment, etc., in order to reduce accidents and injuries. Any improvements in workplace health and safety will, in the long run, result in improved morale and efficient production.

Consider keeping a monthly summary of all personal injuries. Your first aid reports will provide information about minor cuts and bruises that occur in all departments and which should be included in your summary.

Form 7 Analyses

A detailed monthly analysis of all your accident reports (Form 7) will indicate high-risk departments or perhaps departments where training is needed. Distribute the results to your appropriate line managers to enable them to study the problem areas and take corrective action.

A simple system such as this can be of great value. Keep in mind, however, that it will only provide a count of the number of injuries and illnesses. Incorporate information into the dollar cost and/or days lost into the monthly analysis.

This additional information will help to strengthen accountability for health and safety performance and accident costs. As each succeeding month’s analysis is completed, compile a year-to-date total of injuries and illnesses by department and by type. This will allow trends and problem areas to be identified. A records system provides a yardstick for progress. It will tell you where your company is today, which areas need improvement, and ultimately, how successful your efforts have been.

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