This course is designed to introduce management and employees to the seven key elements of a Safety and Health Management Program for the General Industry. It emphasizes steps in developing and deploying the seven elements.
OSHAcademy Course 617 Study Guide

Managing Safety and Health [General Industry]

Copyright © 2020 Geigle Safety Group, Inc.

No portion of this text may be reprinted for other than personal use. Any commercial use of this document is strictly forbidden.

Contact OSHAcademy to arrange for use as a training document.

This study guide is designed to be reviewed off-line as a tool for preparation to successfully complete OSHAcademy Course 617.

Read each module, answer the quiz questions, and submit the quiz questions online through the course webpage. You can print the post-quiz response screen which will contain the correct answers to the questions.

The final exam will consist of questions developed from the course content and module quizzes.

We hope you enjoy the course and if you have any questions, feel free to email or call:

OSHAcademy

15220 NW Greenbrier Parkway, Suite 230
Beaverton, Oregon 97006
www.oshatrain.org
instructor@oshatrain.org
+1 (888) 668-9079

Disclaimer

This document does not constitute legal advice. Consult with your own company counsel for advice on compliance with all applicable state and federal regulations. Neither Geigle Safety Group, Inc., nor any of its employees, subcontractors, consultants, committees, or other assignees make any warranty or representation, either express or implied, with respect to the accuracy, completeness, or usefulness of the information contained herein, or assume any liability or responsibility for any use, or the results of such use, of any information or process disclosed in this publication. GEIGLE SAFETY GROUP, INC., DISCLAIMS ALL OTHER WARRANTIES EXPRESS OR IMPLIED INCLUDING, WITHOUT LIMITATION, ANY WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE. Taking actions suggested in this document does not guarantee that an employer, employee, operator or contractor will be in compliance with applicable regulations. Ultimately every company is responsible for determining the applicability of the information in this document to its own operations. Each employer’s safety management system will be different. Mapping safety and environmental management policies, procedures, or operations using this document does not guarantee compliance regulatory requirements.

Revised: January 14, 2021
This page intentionally blank
## Contents

Course Introduction .................................................................................................................... 1

Modules and Learning Objectives ............................................................................................ 2

Module 1 – The Seven Core Elements ....................................................................................... 2
Module 2 – Taking Action ......................................................................................................... 2
Module 3 – Getting Started ...................................................................................................... 3

Module 1: The Seven Core Elements ....................................................................................... 4

Introduction .............................................................................................................................. 4
Management Leadership .......................................................................................................... 5
Worker Participation ................................................................................................................. 6
Retaliation Against Workers is Illegal ....................................................................................... 6
Hazard Identification and Assessment ....................................................................................... 7
Hazard Prevention and Control ................................................................................................. 8
Safety and Health Education ..................................................................................................... 9
Program Evaluation and Improvement ..................................................................................... 10
Multi-employer Communication and Coordination ................................................................. 11
Continuous Improvement ........................................................................................................ 12
The Benefits .............................................................................................................................. 13

Module 2: Taking Action ......................................................................................................... 15

Demonstrate Commitment to Safety and Health .................................................................... 15
Establish Worker Participation ................................................................................................. 16
Develop Hazard Identification and Assessment Methods ......................................................... 17
Develop Hazard Prevention and Control Methods ................................................................. 19
Educate Management and Employees .................................................................................... 21
Evaluate and Improve the Safety and Health Program ................................................................. 22
Communicate and Coordinate the Safety and Health Program .................................................. 24
Module 3: Getting Started ............................................................................................................. 26
Lead by Example .......................................................................................................................... 27
Implement Reporting System ...................................................................................................... 28
Provide Safety Education ........................................................................................................... 29
Conduct Inspections .................................................................................................................... 30
Collect Hazard Control Ideas ..................................................................................................... 31
Implement Hazard Controls ........................................................................................................ 32
Address Emergencies .................................................................................................................. 34
Partner with OSHA to Improve Workplace Safety Program ....................................................... 35
  Safety & Health Achievement Recognition Program (SHARP) .................................................. 35
  The Voluntary Protection Programs (VPP) ................................................................................ 35
Participate in OSHA On-site Consultations ................................................................................. 36
Course Introduction

Establishing a safety and health program in your workplace is one of the most effective ways of protecting your most valuable asset: your workers. Safety and health programs foster a proactive approach to “finding and fixing” workplace hazards before they can cause injury or illness.

Rather than reacting to an incident, management and workers collaborate to identify and solve issues before they occur. This collaboration builds trust, enhances communication, and often leads to other business improvements. Employers who have implemented safety and health programs, including those in OSHA’s Voluntary Protection Programs (VPP) or the Safety and Health Achievement Recognition Program (SHARP), have also found managing safety results in higher-quality products or output and higher profits.

The recommended concepts, principles, and best practices in this short course build on successful approaches and practices that have evolved under OSHA programs such as VPP and SHARP. They also align with national and international consensus standards.

These best practices can be applied equally well in traditional, fixed manufacturing workplaces and in the service sector, healthcare, retail, and even mobile or office-based work environments. They also include information aimed specifically at the temporary worker and multi-employer work situations. Separate recommended practices are available for the construction industry.
Modules and Learning Objectives

Module 1 – The Seven Core Elements

Learning objectives in this module include:

- List the seven essential elements of an effective safety and health program.
- Describe ways in which management can demonstrate leadership in safety.
- Discuss the reasons why employee participation in safety improvement is important.
- Describe hazard identification and assessment methods.
- Describe hazard prevention and control methods.
- Discuss the importance of an effective safety education and training program.
- Describe safety and health program evaluation and continuous improvement.
- Discuss the importance of multi-employer communication and coordination.
- List and discuss the benefits of an effective safety and health program.

Module 2 – Taking Action

Learning objectives in this module include:

- Give examples of safety policies, goals, and objectives.
- Discuss steps to increase worker participation in safety.
- Describe recordkeeping, inspection, and investigation activities that identify hazards.
- Describe the Hierarchy of Controls strategy for hazard prevention and control.
- Describe the importance of educating management and employees on their safety roles.
- Define and give examples of leading and lagging indicators when evaluating safety performance.
- Discuss effective safety communication and coordination methods.
Module 3 – Getting Started

Learning objectives in this module include:

- Define and describe how the concepts of “value” and “priorities” differ.
- Describe the importance of leading by example.
- List and describe the five areas in which managers and supervisors can demonstrate safety leadership and commitment.
- Discuss strategies that can help ensure effective reporting of hazards, near-misses, incidents and injury accidents.
- Describe the two primary forms of safety education: general instruction and technical training.
- Discuss the two ways to properly document safety instruction and technical training.
- Discuss the importance of using checklists when conducting safety inspections.
- List and describe strategies to collect hazard control ideas.
- List and describe the steps in Deming’s PDSA Cycle.
- Describe the three primary safety programs to help management prepare for emergencies.
- Describe ways to partner with OSHA to help improve the company’s safety and health program.
Module 1: The Seven Core Elements

Introduction

Thousands of responsible employers have used OSHA’s 1989 Safety and Health Program Management Guidelines as a blueprint for setting up an effective safety and health program. OSHA has recently updated the Guidelines for Safety and Health Programs to reflect changes in the economy, workplaces, and evolving safety and health issues. The updated guidelines found in OSHA Publication 3855 – Recommended Practices for Safety and Health Programs is the primary reference for this course.

The program model contains seven core elements:

- Management Leadership
- Worker Participation
- Hazard Identification and Assessment
- Hazard Prevention and Control
- Education and Training
- Program Evaluation
- Multi-employer Communication and Coordination

The seven core elements in a Safety and Health Management Program are interrelated and are seen as part of an integrated system. Actions taken under one core element can (and likely will) affect actions needed under one or more other elements. For example, workers must be trained in reporting procedures and hazard identification techniques to be effective participants. Thus, the “Education and Training” core element supports the “Worker Participation” core element. Progress in each core element is essential to achieve maximum benefit from the program.

You will find implementing these recommended practices also brings other benefits. Safety and health programs help businesses:

- prevent workplace injuries and illnesses
- improve compliance with laws and regulations
- reduce costs, including significant reductions in workers' compensation premiums
- engage workers
- enhance their social responsibility goals
- increase productivity and improve overall business operations

**Quiz Instructions**

Read the material in each section to discover the correct answer to questions. Circle the correct answer. When you’re finished go online to take the final exam. This exam is open book, so you can use this study guide.

1. The seven core elements in a Safety and Health Management System are best viewed _____.
   a. as separate programs
   b. as independent plans
   c. as part of an integrated systems
   d. as necessary to limit OSHA penalties

**Management Leadership**

Management provides the leadership, vision, and resources needed to implement an effective safety and health program.

Management leadership means that business owners, managers, and supervisors do the following:

- They make safety a core value, rather than "prioritizing" safety. Why? Priorities have a habit of changing, especially when the going gets tough. On the other hand, values do not change, ever. As a value, safety is reflected in this statement: "Safe production or no production."

- They are fully committed to eliminating hazards, protecting workers, and continuously improving workplace safety and health.

- They provide sufficient resources (time, money, training, people) to implement and maintain the safety and health program.
• They visibly demonstrate and communicate their safety and health commitment to workers and others.

• They set an example through their actions. If managers and supervisors do not set the best examples, we cannot expect it from employees.

2. Each of the following is an example of how management can demonstrate effective leadership in safety and health, except _____.
   a. prioritizing safety
   b. leading by example
   c. allocating sufficient funds for safety
   d. ensuring everyone is trained

Worker Participation

To be effective, workers and their representatives need to participate in safety and health programs.

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

Here are some reasons why workers should participate in safety:

• Workers have much to gain from a successful program and the most to lose if the program fails.

• They often know the most about potential hazards associated with their jobs. Successful safety programs tap into this knowledge base.

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

Retaliation Against Workers is Illegal

Section 11(c) of the Occupational Safety and Health Act of 1970 prohibits employers from retaliating against employees for exercising a variety of rights guaranteed under the OSH Act, such as filing a safety and health complaint with OSHA, raising a health and safety concern with their employers, participating in an OSHA inspection, or reporting a work-related injury or
illness. OSHA vigorously enforces the anti-retaliation protections provided under 11(c) of the OSH Act and other federal statutes. For more information, see [www.whistleblowers.gov](http://www.whistleblowers.gov).

3. According to the OSH Act of 1970, which of the following actions may employees engage in without fear of employer retaliation?

   a. Preventing others from doing a job
   b. Reporting workers’ compensation errors
   c. Refusing to work due to a disagreement
   d. Raising a safety and health concern

Hazard Identification and Assessment

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

A critical element of any effective safety and health program is a “proactive,” ongoing process to identify and assess such hazards. Hazard identification and assessment are proactive because they are processes that occur before someone gets hurt.

Effective hazard identification and assessment includes:

- Procedures are put in place to identify workplace hazards and evaluate risks continually.
- Safety and health hazards from routine, non-routine, and emergencies are identified and assessed.
- An initial assessment of existing hazards, exposures, and control measures is followed by periodic inspections and reassessments to identify new hazards.
- Non-injury incidents are investigated with the goal to identify root causes.
- Identified hazards are prioritized for control.
4. Why is hazard identification and assessment considered a “proactive” process?
   a. They occur before someone gets hurt
   b. They respond to injuries in a timely manner
   c. They are part of the accident investigation procedure
   d. They prevent the need for reactive processes

Hazard Prevention and Control

Hazard prevention and control processes are conducted after hazards are identified and assessed. They help employers prevent existing and potential hazards and eliminate or otherwise control hazards in the workplace.

- Employers and workers cooperate to identify and select methods for eliminating, preventing, or controlling workplace hazards.
- Controls are selected per the “Hierarchy of Controls” that first try to eliminate hazards. Engineering solutions, followed by safe work practices, administrative controls, and finally personal protective equipment (PPE) are used to control hazards. We’ll discuss more on this topic later.
- Plans are developed to ensure controls are implemented, interim protection is provided, progress is tracked, and the effectiveness of controls is verified.

Effective hazard prevention and control methods protect workers and have the following benefits:

- Eliminate or reduce workplace hazards;
- Help avoid injuries, illnesses, and incidents;
- Minimize or eliminate safety and health risks; and
- Help employers provide workers with safe and healthful working conditions.
5. **What is the first priority in the “Hierarchy of Controls” to prevent hazards in the workplace?**

   a. Administrative controls  
   b. Elimination  
   c. Engineering controls  
   d. Personal Protective Equipment

---

**Safety and Health Education**

Safety and health education, through general instruction and technical training, is important for informing workers and managers about workplace hazards and controls so they can work more safely and be more productive.

- **General safety instruction** tells employees why safety is important through lectures, videos, discussions, etc.

- **Technical safety training** shows them how to do the task or procedure safely. Technical training requires demonstration and practice to make sure workers gain the required skills to work safely. On-the-Job Training (OJT) is one of the most effective methods used to teach and verify skills.

It is important to emphasize both instruction and technical training. If employees do not know why safety is important, they are less likely to care about working safely.

Safety and health education also provides workers and managers with a greater understanding of the safety and health program itself so they can contribute to its development and implementation.

Effective safety and health education programs have the following characteristics:

- All workers are trained to understand how the program works and how to carry out their responsibilities under the program.

- Employers, managers, and supervisors receive training on safety concepts and their responsibilities to protect workers’ rights and respond to workers’ reports and concerns.

- All workers are trained to recognize workplace hazards and to understand the control measures that are implemented.
6. Which of the following is one of the most effective technical safety training methods?

   a. Lecture and orientation
   b. Online training and webinars
   c. Videos and group discussion
   d. On-the-job training (OJT)

Program Evaluation and Improvement

Once a safety and health program has been established, it should be evaluated initially to verify it is implemented as intended. After that, employers should periodically, which means at least annually step back, assess what is working and what is not, and assess whether the program is on track to achieve its goals.

Whenever these assessments identify opportunities to improve the program, management should adjust and monitor how well the program performs.

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

Effective program evaluation and improvement include the following characteristics:

- Programs are analyzed, evaluated, and improved by using leading indicators.
- Control measures are evaluated for effectiveness periodically.
- Processes are established to monitor program performance, verify program implementation, and identify program shortcomings and improvement opportunities.
- The program and overall safety and health performance are improved by taking necessary actions.
7. In effective safety and health programs, the periodic evaluation and improvement process occurs at least _____.
   a. continually
   b. quarterly
   c. annually
   d. every five years

Multi-employer Communication and Coordination

In today’s economy, staffing agencies assign an increasing number of workers to work at specific “host” worksites under the host employer’s direction and control.

Examples include seasonal workers, such as delivery drivers and warehouse workers, who help fill temporary staffing needs. In these situations, the staffing agency and the host employer need to communicate and coordinate to provide and maintain a safe work environment for their workers.

Some workers are employed by a host employer and others by a contractor or subcontractor in other situations.

Examples include electrical or mechanical contractors working in a facility, a vendor installing or maintaining equipment, or long-term contractors providing building cleaning and maintenance. In these circumstances, each employer and contractor must consider how its work and safety activities can affect the safety of other employers and workers at the site.

Characteristics of effective multi-employer communication and coordination include:

- Host employers, contractors, and staffing agencies commit to providing the same level of safety and health protection to all employees.
- Staffing agencies provide general safety education to temporary employees, and host employers provide specific technical training for required tasks and procedures.
- Host employers, contractors, and staffing agencies communicate the hazards present at the worksite and the hazards that contract workers may create on site.
- Host employers establish specifications and qualifications for contractors and staffing agencies.
• Before beginning work, host employers, contractors, and staffing agencies coordinate work planning and scheduling to identify and resolve conflicts that could affect safety or health.

8. On multi-employer worksites, who is responsible for providing technical training for specific tasks and procedures?
   
   a. Host employers  
   b. Staffing agencies  
   c. Contractors  
   d. Third-party providers

Continuous Improvement

The seven program elements discussed in this module emphasize a proactive approach to managing workplace safety and health. Unfortunately, traditional methods focus on a reactive approach. Let’s look at the difference between the two approaches.

• **A reactive approach:** Traditional approaches are often reactive - that is, actions are only taken *after* a worker is injured or becomes sick, a new standard or regulation is published, or an outside inspection finds a problem that must be corrected.

• **A proactive approach:** Finding and fixing hazards *before* they cause injury or illness is a far more effective approach. Doing so avoids the direct and indirect costs of worker injuries and illnesses and promotes a positive work environment.

The concept of continuous improvement is central to an effective safety and health culture and related programs. W. Edwards Deming championed a continuous improvement process that became known as the Plan-Do-Study-Act (PDSA) Cycle. We will take a closer look at this process in the next module.
9. In which approach to continuous improvement will solutions emphasize preventing hazards and accidents?

a. Integrated approach  
b. Reactive approach  
c. Hierarchy approach  
d. Proactive approach

The Benefits

Responsible employers know the primary goal of a safety and health program is to prevent workplace injuries, illnesses, and deaths, and the suffering and financial hardship these events can cause for workers, their families, and their employers.

Employers may find effectively implementing the best practices described in each of these core elements brings other benefits as well, such as:

- There are improvements in product, process, and service quality.
- It creates higher workplace morale. If management cares, employees are more likely to care.
- It creates improved employee recruiting and retention.
- There is a more favorable image and reputation as an industry leader (among customers, suppliers, and the community).
- There is a better relationship with regulatory agencies. They will perceive the company as a “good player.”
10. The main goal of a safety and health program is to _____ workplace injuries, illnesses, and deaths.

   a. decrease
   b. prevent
   c. monitor
   d. solve
Module 2: Taking Action

A safety management system has four main components: structure, inputs, processes, and outputs. This module will discuss important actions management can take to develop and maintain these important components. The first critical need is for management to demonstrate a real commitment to safety, not just with words, but with serious action: spending serious time and money on the safety function.

Demonstrate Commitment to Safety and Health

Establish policies and procedures. You will need to write a policy statement signed by top management describing the organization’s commitment to safety and health. The signed policy should also pledge to establish and maintain an effective safety and health program for all workers. Here are a few things to remember:

- Communicate the policy to everyone.
- Consider safety and health in all business decisions.
- Be visible and set an example by following all safety procedures.
- Begin work meetings with a review of safety and health items on a "to-do" list.

Define program goals and objectives: Safety goals and objectives should focus on specific actions that will improve workplace safety and health.

- Establish general safety goals and specific, realistic, measurable objectives for improving safety and health.
- Emphasize proactive injury and illness prevention rather than reactive injury and illness rates.
- Develop short-term tactics and long-term strategies to achieve the goals and objectives.
- Assign tasks and responsibilities to people, setting time frames, and determining resource needs.

Provide resources: Provide the necessary resources to implement the safety and health program, pursue program goals, and address identified program shortcomings.

- Estimate the resources needed to establish and implement the program.
- Allow time in workers' schedules for them to fully participate in the program.
• Integrate safety and health into planning and budgeting processes and align budgets with program needs.

• Provide and direct resources to operate and maintain the program, meet safety and health commitments, and pursue program goals.

1. All of the following are ways management can demonstrate commitment to safety and health, except ______.
   a. beginning meetings with safety
   b. emphasizing proactive prevention
   c. keeping safety budgets separate from operations
   d. developing long-term safety strategies

Establish Worker Participation

Encourage workers to participate in the program. Encouraging involvement sends the message management values their input into safety and health decisions.

• Give workers the time and resources to participate in the program.

• Give positive recognition to those who participate in the program.

• Have an open-door policy that invites workers to talk to managers about safety and health.

• Make sure workers know participation will NEVER result in a negative action.

• Give workers access to safety data sheets, injury and illness data, inspection results, and other reports.

• Include workers at every step of program design and implementation.

Encourage workers to report safety and health concerns. Employers can address issues before someone gets hurt or becomes ill by encouraging reporting and following up promptly on all reports.

• Establish a process for workers to promptly report injuries, illnesses, close calls/near misses, hazards, and other safety and health concerns.

• Respond to reports promptly.
Empower all workers to initiate or request the suspension or shut down any work activity or operation they believe to be unsafe.

Involve workers in finding solutions to reported issues.

**Remove barriers to participation.** Workers must believe their input is welcome, their voices will be heard, and they can access reporting mechanisms.

- Ensure workers from all levels of the organization can participate regardless of their skill level, education, or language.
- Provide frequent and regular feedback to show employees that their safety and health concerns are being heard and addressed.
- Ensure that the program protects workers from being retaliated against for any form of participation in the safety and health program.

2. **What is a major reason for a lack of worker participation in safety and health.**

   a. Lack of time
   b. Fear of retaliation
   c. Limited recognition
   d. Inadequate opportunity

**Develop Hazard Identification and Assessment Methods**

**Collect existing information about workplace hazards.** Collect, organize, and review information with workers. The information available in the workplace may include:

- Safety Data Sheets (SDSs) provided by chemical manufacturers
- records of previous injuries and illnesses, such as OSHA 300 and 301 logs and reports of incident investigations
- exposure monitoring results, industrial hygiene assessments, and medical records (appropriately redacted to ensure patient/worker privacy)
- results of job hazard analyses, also known as job safety analyses
3. All of the following information should be collected to help identify and assess hazards, except _____.
   a. Safety Data Sheets (SDSs)
   b. Job Hazard Analysis (JHA)
   c. Records of previous injuries and illnesses
   d. Workers’ compensation projections

**Inspect the workplace for safety and health hazards.** Setting aside time to regularly inspect the workplace for hazards can help identify and address shortcomings before an incident occurs.

- Conduct regular initial and follow-up inspections using checklists of all operations, equipment, work areas, and facilities with workers. Inspect before and after changing operations.
- Take photos or videos of problem areas to facilitate later discussion and brainstorming about controlling and using them as learning aids.
- Regularly inspect industrial vehicles (e.g., forklifts, powered industrial trucks) and transportation vehicles (e.g., cars, trucks).
- Inspect the workplace and medical records for exposure to physical, biological, and ergonomic health hazards.

**Conduct incident and accident investigations.** Investigate all incidents (injury and non-injury), including historical reports, to identify hazards that are likely to cause future harm.

- Focus on identifying root causes (and there is often more than one) to uncover safety management system weaknesses.
- Develop a clear plan and procedure for conducting incident investigations so that an investigation can begin immediately when an incident occurs.
4. In an effective hazard identification and assessment program, ____ are investigated.

   a. all injury and non-injury incidents
   b. lost-time injury accidents
   c. OSHA-required incidents
   d. only at-fault accidents

Develop Hazard Prevention and Control Methods

Identify control options. Collect, organize, and review information with workers to determine what types of hazards may be present and which workers may be exposed or potentially exposed. The information available in the workplace may include:

   • Review OSHA standards and guidance, industry consensus standards, National Institute for Occupational Safety and Health (NIOSH) publications, manufacturers' literature, and engineering reports to identify potential control measures.

   • Get input from workers who can suggest and evaluate solutions based on their knowledge.

   • For complex hazards, consult with OSHA's On-site Consultants and workers’ compensation insurers. (Note: Every state has its own workers’ compensation insurers.)

5. For complex hazards, a good hazard and control strategy is to consult with _____.

   a. OSHA free on-site enforcement inspectors
   b. OSHA's on-site consultants and insurers
   c. OSHA engineers with appropriate qualifications
   d. OSHA administrators and inspectors

Select controls. Select the controls that are the most feasible, effective, and permanent.

   • Use the Hierarchy of Controls, which emphasizes elimination, substitution, and engineering solutions, to select controls.

   • Eliminate or control all serious hazards immediately.

   • Use interim controls while you develop and implement longer-term solutions.

   • Avoid selecting controls that may directly or indirectly introduce new hazards.
• Review and discuss control options with workers to ensure that controls are feasible and effective.

• Use a combination of control options when no single control option fully protects workers.

• Select controls to protect workers during non-routine operations and emergencies.

**Implement selected controls in the workplace.** Implement identified hazard prevention and control measures per priorities in the written hazard control plan.

• When resources are limited, implement measures on a "worst first" basis. Regardless of limited resources, employers are obligated to protect workers from recognized, serious hazards.

• Promptly implement any measures that are easy and inexpensive.

• Follow up to confirm that controls are effective. Inspect and track progress and results.
6. What is the strategy when no single hazard control option fully protects workers?
   a. Use any one of the control options
   b. Use the most restrictive control option
   c. Use the highest control option
   d. Use a combination of control options

**Educate Management and Employees**

**Provide program awareness training.** Provide awareness and training to all managers, supervisors, workers, contractors, and temporary workers on safety roles, policies, plans, programs, processes, and procedures. Here are the necessary components to focus on:

- safety and health policies, goals, and procedures
- functions of the safety and health program
- whom to contact with questions or concerns about the program (including contact information)
- how to report hazards, injuries, illnesses, and close calls/near misses
- what to do in an emergency
- the employer’s responsibilities under the program
- workers’ rights under the OSH Act
- information on the safety and health hazards of the job site and the controls for those hazards
- training is provided in the language(s) and at a literacy level that all workers can understand
- The program can only work when everyone is involved and feels comfortable discussing concerns; making suggestions; and reporting injuries, incidents, and hazards.
- Confirm as part of the training that all workers have the right to report injuries, incidents, hazards, and concerns and to participate in the program fully without fear of retaliation.

**Train workers on their specific roles in the safety and health program.** Additional training is needed to ensure workers can accomplish assigned safety and health responsibilities.
• Instruct workers on how to report injuries, illnesses, incidents, and concerns.

• Instruct employers, managers, and supervisors on fundamental safety concepts and management techniques.

• Develop a formal process for determining the training needs of workers, supervisors, and managers.

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

• Train employers, managers, and supervisors on procedures for responding positively to workers' reports.

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

### 7. Which of the following should be emphasized in general awareness-level safety education?

a. Processes for developing a learning needs assessment

b. The program can only work when everyone is involved

c. The need for simulated accident investigation practice

d. Methods for responding to reports of injuries

---

**Evaluate and Improve the Safety and Health Program**

**Monitor performance and progress.** The first step in monitoring is to define indicators that will help track performance and progress. Use both lagging and leading indicators to help monitor performance and progress.

**Lagging indicators** generally track worker exposures and injuries that have already occurred. Lagging indicators include:

• number and severity of injuries and illnesses

• results of worker exposure monitoring that show that exposures are hazardous

• workers' compensation data, including claim counts, rates, and cost
Leading indicators track how well various aspects of the program have been implemented and reflect steps taken to prevent injuries or illnesses before they occur. Leading indicators include:

- level of worker participation in program activities
- number of employee safety suggestions
- number of hazards, near misses, and first aid cases reported
- amount of time taken to respond to reports
- number and frequency of management walkthroughs
- number of workers who have completed required safety and health training
- timely completion of preventive maintenance and corrective actions after a workplace hazard is identified or an incident occurs

Employers, managers, supervisors, and workers should establish and follow procedures to collect, analyze, and review performance data.

8. The number of hazards, near misses and first aid cases reported are examples of _____ indicators.
   a. future
   b. lagging
   c. leading
   d. inappropriate

Correct program shortcomings and identify opportunities to improve. Whenever a problem is identified in any part of the safety and health program, take prompt action to correct the problem and prevent its recurrence.

- Proactively seek input from managers, workers, supervisors, and other stakeholders to improve the program.
- Determine whether changes in equipment, facilities, materials, key personnel, or work practices trigger any need for changes in the program.
9. Whenever a serious problem is identified in any part of the safety and health program, _____.
   a. schedule corrective actions by the end of the quarter
   b. take prompt action to correct the problem and prevent its recurrence
   c. keep the problem confidential until it can be fixed
   d. immediately inform OSHA and request an enforcement inspection

Communicate and Coordinate the Safety and Health Program

Establish effective communication. Develop and deploy a plan to ensure the exchange of information about hazards so all workers on the site are aware of worksite hazards and the methods and procedures needed to control exposures to them.

- Communicate information before on-site work starts and as needed if conditions change.
- Communicate with contractors and staffing agencies to determine who will implement and maintain the safety and health program before work begins and put it in contracts.
- Establish procedures to exchange information with contractors and staffing agencies about hazards, protective measures, and emergency response.
- Host employers and contractors should distribute information to enable each employer to assess hazards encountered by its workers and avoid creating hazards that affect workers on the site.
- Contractors and staffing agencies should regularly give the host employer information about injuries, illnesses, hazards, or concerns.

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

Host employers:

- Include in contracts and bid documents any safety-related specifications and qualifications and make sure contractors meet those requirements.
• Identify issues that may arise during on-site work and include procedures for resolving any conflicts before work starts.

Host employers coordinate with contractors and staffing agencies to:

• Ensure work is planned and scheduled to minimize impacts on safety.
• Ensure staffing agency workers are adequately trained and equipped before arriving on the worksite.
• Harmonize their safety and health policies and procedures to resolve important differences so that all workers at the site have the same protection.

Host employers and staffing agencies:

• Work together to deal with unexpected staffing needs by ensuring adequate training and lead time is provided for workers.
• Make sure managers with decision-making authority are available and prepared to deal with day-to-day coordination issues.

10. **Communicate with contractors and staffing agencies to determine who will implement and maintain the safety and health program before work begins and _____**.

   a. put it in the contracts
   b. report it to OSHA
   c. put the information in a binder
   d. inform the workers' compensation insurer
Module 3: Getting Started

When you get off on the right foot, it helps ensure the safety management system and programs work effectively. Here are some important points to remember:

Set safety and health as a core corporate value – not just a priority.

To understand what we mean by the statement above, let’s take a closer look at the definitions of “values” and “priorities,” and then look at the difference between the two concepts.

- **Values**: Values are deeply held principled beliefs that do not change with circumstances. Values reflect a person’s ethics, morals, and codes of behavior. If you see a list of values, they will not be listed by importance. All the values are considered equally important.

- **Priorities**: If a person regards something as more important than another, it is a priority. The most important things will be given higher priority and greater attention. A prioritized list will always be numbered with higher priority things listed first.

- **Values vs. Priorities**: The two primary differences between values and priorities are:
  
  a. **Values do not change**. This statement is important, especially when the “going gets tough.” For instance, if a project was behind schedule, safety would not be ignored to meet a deadline.

  b. **Priorities do change**. As circumstances change, so do priorities. If safety procedures are ignored or modified in the attempt to keep a schedule, you know safety is merely a priority and not a value.

You have all seen the “Safety First” sign in the workplace. It is a value statement written as a priority. If the company does not actually keep safety first, in words and actions, employees will be reminded each time they see a sign that management does not live up to its values. Consequently, the safety culture of the company will suffer.

A few examples of safety expressed as a value include:

- Safety is a part of everyone’s job description and is included in performance appraisals.
- Management complies with the same safety rules as employees – no exceptions.
- Accountability applies equally to all employees: bottom to top.
1. How do you know something is management’s core value?
   a. Because management says it is
   b. It does not change when the going gets tough
   c. Because it receives top priority
   d. It is stated as part of a written program

Lead by Example

Practice safe behaviors yourself and make safety part of your daily conversations with workers. It is important to practice and discuss safety regularly to make sure managers and supervisors are displaying effective leadership.

Ask these important questions to determine if you, as a manager or supervisor, are demonstrating leadership by example:

**Supervision:** Have I provided adequate safety oversight? I'm not stuck in my office all day. I'm overseeing their work regularly so I'm able to detect and correct unsafe behaviors and hazardous conditions before they cause an injury.

**Training:** Have I provided (or has the employee received) quality safety training? The employee has the required knowledge and skills to comply. The employee understands the natural and system consequences of noncompliance.

**Accountability:** Have I applied safety accountability fairly and consistently in the past? The employee knows he or she will be disciplined if caught.

**Resources:** Have I provided the tools, equipment, PPE, fall protection, and other resources to do that job safely? Tools, equipment, machinery, PPE, etc., are always in good working order.

**Support:** Have I provided adequate psychosocial support that promotes working safely? Do I give employees enough time to work safely? Do they know I am tough on safety because I care about them and their success?

If you, as managers or supervisors, can honestly answer "yes" to each of the above questions, you are fulfilling your very important responsibilities and demonstrating effective leadership by example.
2. If you detect and correct unsafe behaviors and hazardous conditions before they cause an injury, that’s good _____.
   a. compliance
   b. training
   c. accountability
   d. supervision

**Implement Reporting System**

Develop and communicate a simple procedure for workers to report any injuries, illnesses, incidents (including near misses/close calls), hazards, or safety and health concerns, without fear of retaliation. Let’s look at some ways management can help make reporting safety issues effective.

- Positive responses and recognition when employees report safety concerns, hazards, near misses, and injury accidents sends a message of appreciation to employees and helps to build trust: a critical requirement.

- It is important managers and supervisors respond in a timely manner to reports, especially those that involve injury accidents and serious hazards that could cause injury. Regardless of the nature of the report, it is equally important to thank employees for reporting every time.

Now, here is a word about “anonymity.” You may read it is important to allow employees to report hazards or concerns anonymously, and in some instances, that is true. But remember, everything we do sends a message to someone.

What is the message when we allow or encourage anonymous reporting? It tells employees they may have a good reason not to trust management.

In a world-class safety culture where trust exists, employees would not think to report anonymously because, without a doubt, management will positively recognize them every time they report. Trust between employees and management will increase reporting, which represents a leading indicator of effective safety management.
3. Why is it so important to give positive recognition when employees report hazards, near-misses, incident and injuries?

   a. It makes management look good
   b. It builds trust with managers
   c. It helps maintain anonymity
   d. It keeps gossip to a minimum

Provide Safety Education

Of course, it’s important to properly train all workers on how to identify and control hazards in the workplace. However, too often, “training” takes a back seat to other operational priorities, which is one of the primary reasons the company may have a poor safety record.

There are two basic types of safety education: general instruction and technical training.

- **General instruction**: This form of education includes new employee orientation, safety meetings, and general information. Emphasis is placed on gaining knowledge. Written tests are adequate for student evaluation.

- **Technical training**: Technical training involves teaching employees how to do something. Emphasis is placed on practice to gain adequate skills to do the job safely. In addition to written tests, evaluating both knowledge and skills requires student demonstration.

When OSHA shows up at your workplace to conduct routine inspections or accident investigations, what do you think might be the first safety area they look at? If you said, “training,” that is correct!

Why would OSHA first look at your safety training program? Because they know it is the program most likely to be inadequate or the root cause for an accident. Make sure your safety training program is formal (in writing) and well-documented. Here is how to document training:

- **Attendance rosters**: For orientations and classroom instruction of general safety information, an attendance roster will be adequate.
• **Certification:** For specific technical training, especially when it involves hazardous materials or procedures, ensure the training is documented using a formal certification process. Trainers should certify students have demonstrated adequate knowledge and skills in the learning environment. Next, supervisors should certify their employees have gained adequate knowledge and skills on the job. The certification should be in writing.

For more information on safety training programs, take OSHAcademy courses 703, 721, and 723.

4. **Which of the methods below is adequate for technical safety training of hazardous procedures?**

   a. Written certification of knowledge and skills
   b. Written attendance roster
   c. Formal test results of topics covered
   d. Supervisor verification of attendance

**Conduct Inspections**

Employees should inspect the materials, equipment, and tools they use and their immediate workstation for hazardous conditions at the start of each workday. They should inspect equipment such as forklifts, trucks, and other vehicles before using them at the beginning of each shift. Again, it is better to inspect closely and often.

**Inspection Checklists:** Use checklists, such as those included in OSHA’s Small Business Handbook (PDF), to help identify problems.

If you are asked to write questions for a safety inspection, use the following steps:

- Determine the area to be inspected.
- Ask workers in the area what tasks/jobs they do.
- Ask them to send you a copy of the applicable rules.
- When you receive the rules (don’t panic), read through the applicable sections and mark those rules that you think might result in serious injury if violated.
- Change each marked rule into a simple question. Questions will start with the words: Do, does, is, are.
• Construct your checklist using the questions you developed.

• Be careful your checklists do not cause “tunnel vision” in which hazards can be missed if they are not listed on the checklist.

By its very nature, the walk-around inspection, as a process, is ineffective in uncovering most of the causes of accidents (unsafe behaviors). This is because most inspectors look primarily at hazardous conditions and do not take enough time to watch and analyze work procedures effectively. Sometimes the inspectors walk into an area, look up, look down, look all around, and possibly ask a few questions, and move on to the next work area.

It is possible to inspect a work area on Monday and then experience a fatality on Tuesday because of unsafe work behavior that the inspection failed to uncover the day before. The solution is to take your time when inspecting, watch work being done, and ask questions.

5. Which of the following is the primary reason walk-around safety inspectors fail to detect most of the surface causes of accidents?
   a. Workers give inspectors tunnel vision
   b. Inspectors ignore unsafe behaviors
   c. Workers are careful when inspectors are present
   d. Inspectors look primarily at conditions

Collect Hazard Control Ideas

In addition to the walk-around inspection, other strategies can effectively obtain ideas from employees to improve safety in the workplace.

• The Job Hazard Analysis: The Job Hazard Analysis (JHA) is an important process that helps collect ideas for controlling hazards in the analyzed jobs. Employee involvement in the JHA development process also helps ensure they will use the safe job procedure developed by the JHA when not directly supervised. Employees want to work efficiently, which means they are more likely to use procedures they believe will get the job done most efficiently.

• Suggestion program: The employee safety suggestion program is another excellent way to collect ideas from employees. Employees who work every day performing hazardous
jobs, or working in hazardous work areas, will gain experience and insight into how the hazards they encounter can be eliminated or controlled.

- **Incident investigation:** Near misses and non-injury incident investigations can be helpful opportunities for gathering facts. They are both reactive and proactive. They are reactive because they occur after an incident occurs and are proactive because they occur before someone is injured.

- **Accident investigation:** Although this process does not start until after an injury accident has occurred, it can still be very effective in identifying and controlling hazards to prevent future accidents. Unfortunately, many times someone gets hurt, and the company suffers even before initiating this activity.

### 6. Why is it smart to involve employees in the JHA development process?

- a. It saves a lot of money by using employees
- b. They will be more likely to use the procedure
- c. Anyone can understand the procedure
- d. Most JHAs require employee involvement

**Implement Hazard Controls**

Assign workers the task of choosing, implementing, and evaluating the solutions they produce. When implementing hazard controls, or any change for that matter, you must take small steps. This idea is central to Deming’s PDSA Cycle, as described in the image below.
Deming’s PDSA Cycle

As you can see, the first step is to design and develop hazard control strategies. Base your design on objective facts and best practices within the industry.

Next, implement the control strategies in a limited manner. If you have many facilities, implement the control strategy in one facility (unless an imminent danger situation exists).

See how the control strategy has improved the process or work area. If the control strategy works, then move on to the next step. If it doesn’t work, revise the change or throw it out and start over.

If the control strategy works, then adopt it in all relevant locations. It is also important to conduct a follow-up analysis by moving on, once again, to the cycle’s first step.
7. In Deming’s PDSA cycle, what is true about making changes to the safety and health program?

a. Make small changes
b. Make many changes because one of them will work
c. Don’t make a change until it is verified
d. Keep changes even if they are not perfect

Address Emergencies

Identify foreseeable emergency scenarios and develop instructions on what to do in each case. Meet to discuss these procedures and post them in a visible location in the workplace.

- Include a written Emergency Action Plan and a Fire Prevention Plan in your company’s safety and health program.
- Make sure evacuation procedures are known and practiced by all employees.
- Train employees on how to use fire extinguishers.
- Train employees on first aid/CPR procedures in case of medical emergencies.

Suppose the possibility of uncontrollable releases of hazardous substances or fire can occur at the workplace, and the employer expects employees to control those emergencies. In this case, a Hazardous Waste Emergency Response Plan (HAZWOPER) may be required.

For more information on emergency preparedness, check out OSHAcademy courses 717 Emergency Action Plans and 718 Fire Prevention Plans.
8. Which two plans are necessary to make sure the company is ready for emergencies?

   a. Accident Investigation Plan, Evacuation Plan
   b. Sustainability Plan, Workplace Violence Plan
   c. Emergency Action Plan, Fire Prevention Plan
   d. Fire Action Plan, Chemical Spill Plan

Partner with OSHA to Improve Workplace Safety Program

It is smart business for your company to partner with OSHA by participating in one or more of the programs below:

Safety & Health Achievement Recognition Program (SHARP)

This program recognizes small business employers who have used OSHA’s On-site Consultation Program services and operate an exemplary injury and illness prevention program. Acceptance of your worksite into SHARP from OSHA is an achievement of status that singles you out among your business peers as a model for worksite safety and health.

The Voluntary Protection Programs (VPP)

These OSHA programs promote effective worksite-based safety and health. In the VPP, management, labor, and OSHA establish cooperative relationships at workplaces that have implemented a comprehensive safety and health management system. Approval into VPP is OSHA’s official recognition of the outstanding efforts made by employers and employees who have achieved exemplary occupational safety and health.

- **Star**: Recognition for employers and employees who demonstrate exemplary achievement in the prevention and control of occupational safety and health hazards the development, implementation, and continuous improvement of their safety and health management system.

- **Merit**: Recognition for employers and employees who have developed and implemented good safety and health management systems but must take additional steps to reach Star quality.
• **Demonstration:** Recognition for employers and employees who operate effective safety and health management systems that differ from current VPP requirements. This program enables OSHA to test the efficacy of different approaches.

9. Which program recognizes small business employers who have used OSHA’s On-site Consultation Program services?

   a. Safety and Health Achievement Recognition Program (SHARP)
   b. Voluntary Protection Program (VPP)
   c. OSHA Consultation Recognition Program (OCRP)
   d. Small Employer Excellence in Safety Program (SEESP)

**Participate in OSHA On-site Consultations**

OSHA’s On-site Consultation Program offers free and confidential safety and occupational health advice to small and medium-sized businesses in all states across the country, with priority given to high-hazard worksites. On-site Consultation services are separate from enforcement and do not result in penalties or citations. Consultants from state agencies or universities work with employers to identify workplace hazards, provide advice on compliance with OSHA standards, and assist in establishing injury and illness prevention programs.

The consultation is confidential and will not be reported routinely to the OSHA inspection staff. No citations or penalties are issued. Your only obligation is to correct serious job safety and health hazards—a commitment you are expected to make prior to the actual visit and carry out in a timely manner.
10. All the following are true concerning OSHA on-site consultations, except _____.

   a. they are free services provided by OSHA
   b. they will not result in fines and penalties
   c. they cost only a small administrative fee
   d. they require the employer to correct serious hazards