

## **SAMPLE INDUSTRIAL SAFETY ASSESSMENT REPORT**

### **Safety Assessment of Existing Safety Management Program**

#### **1. Written Safety Management Program**

At present, a written safety management program is in place for the employees of XYZ Company. The manual appears to be well written, and very inclusive. Some policies appear to have been taken from other sources, and are in a different format from those created in house.

In recognizing the written safety policies in place, it was also noted that there is no written safety management plan that forms the basis for the safety management program. A Safety Policy Statement exists, but it unsigned, and has no authority behind it.

**RECOMMENDATION:** At minimum, a safety management plan should be written to include:

##### **a. Statement of Policy from Company President**

**RECOMMENDATION:** It is imperative, for the safety management plan to work, that the CEO of the company issues a statement of policy. This statement recognizes the criticality of an effective safety management program, and empowers officials throughout the company to develop, implement and enforce safety management programs. It is a commitment statement by the highest ranking official for the company, and clearly spells out to all employees that safety management is something that is taken seriously in the company, and that accepted safety programs and safety rules and regulations will be followed at all times.

##### **b. Prescribed Lines of Accountability**

**RECOMMENDATION:** The safety management plan should establish lines of accountability in all directions. The company must decide who is going to be responsible for safety management activities and safety outcomes in each area of operation. The written plan should identify the responsible position, and should also recognize that the office holders in

these positions have the authority vested by the CEO of the company to implement and enforce safety management activities.

We commend Shenandoah Tower for their documented enforcement of safety rules and regulations. During the visit, we asked for records showing that the company had taken disciplinary action against employees for violating safety rules and regulations. Without hesitation, we were provided with copies of two recent disciplinary write-ups against two different employees, as well as documentation of a three day unpaid suspension against a supervisor for failing to comply with the safety directives of the company.

**RECOMMENDATION:** Accountability for safety outcomes must be clearly defined throughout XYZ Company, and those responsible for these outcomes held accountable. This would include taking appropriate disciplinary action against employees not adhering to safe work practices, as well as disciplinary action against supervisors who do not continuously enforce safe work practices.

#### **c. Required Written Employee Safety Programs**

Regulatory requirements are clear that certain written employee safety programs must exist across all industry lines. In reviewing the information and documents provided, it became obvious that, while certain safety policies exist, others appear to be non-existent.

**RECOMMENDATION:** At minimum, it is our recommendation that the following safety policies be developed in writing, disseminated across all operating lines, required training provided for, and the content of these policies aggressively enforced at all times. These policies include:

- § Accident Reporting and Investigations
- § Workplace Violence and Aggression Management
- § Ergonomics / Cumulative Trauma Disorders
- § Safety Training (as documented below)
- § Site Safety Inspections
- § Safety Training for New Employees
- § Control of Hazardous Energy (Lock Out / Tag Out)
- § Preventive Maintenance

**RECOMMENDATIONS:** The safety policy manual should be distributed throughout the company, and training programs provided to all staff on policy content, intent, and on compliance.

Consideration should be given to a procedure to review maintenance work orders, to determine if repairs are the result of normal wear and tear that might have been corrected in a routine preventive maintenance (PM) program. Emergency call repairs are usually more expensive than normal PM.

## **2. Safety Committee**

XYZ Company, Inc. has reached a point of growth where a formal Safety Committee should be considered. This safety committee need not be cumbersome or overly burdensome; a quarterly meeting would be more than adequate.

The structure of the safety committee should provide for a blend of management, clerical, and field staff. A chairman, most likely the Safety Director, should be appointed, and minutes kept of all meetings. Any tasks assigned should be documented to include the name of the person to whom they are assigned, an established completion date, and a place for reporting on the next meeting agenda.

Goals or objectives for the safety committee should also be established. The establishment of goals and objectives allows the committee to monitor its outcomes and effectiveness on an ongoing basis. Without goals and objectives, the committee “flies by the seat of its pants” with no direction or outcomes to provide direction.

### **RECOMMENDATIONS:**

1. XYZ Company is encouraged to develop a safety committee made up of management, clerical, and field staff. The committee should establish quantifiable goals and objectives so that its progress can be monitored, and outcomes measured.

2. It is our recommendation that the safety committee establish an agenda for each meeting, and that agenda criteria be developed as well. Common agenda items can be followed, including:

- New Business
- Old Business
- Safety Training
- Safety Recommendations
- Regulatory Issues
- Review of Recent Accidents and Injuries
- Site Safety Inspections
- Other items of interest

We recommend that the safety committee **NOT** focus on workers compensation issues, or on the cost of workers compensation claims. The focus of a safety committee should be on safety management issues, and on the development and ongoing support of a proactive safety management program. Workers compensation issues should be left to the administrative and financial arm of the company, and should be seen as a reactive tool, and not as a function of a safety committee.

### 3. Safety Training

Safety training is a critical component of an effective safety management plan. It provides the employee with the opportunity to be properly trained in the rules and regulations of the company; it provides the employee with the fundamental skills to perform his or her job in the safest manner; and it allows management to observe performance and behaviors of its employees, and to correct unsafe acts before an injury occurs.

During the review of ABC Company's employee safety program, we found inconsistent documentation of safety training taking place. The safety training program should address training issues that are both statutory and/or regulatory. Statutory training refers to those areas where training is required by state law. Regulatory training refers to training requirements imposed by regulatory agencies such as OSHA. Statutory and training issues need to be addressed for each job category in the company. Appendix A represents a random summary of training for the years 2004 – 2005, for 18 employees, roughly 33% of the work force. In 2004, the training was minimal, in 2005 is appeared to be gaining momentum, and based on documentation found in

employees training files, it appears to be falling off again in 2006.

It must be noted that the new Safety Director has already begun developing and planning ongoing safety training for the employees, which represents a major success marker for the program. However, in addition to planning and scheduling training, management has to accept the responsibility to enforce training requirements on the employees, and make sure employees are scheduled for and attending required training.

**RECOMMENDATION:** A training program should be provided based on three categories:

- 1) Loss experience / needs assessment.
- 2) Safe work practices / industry best practices
- 3) Statutory and regulatory requirements.

**RECOMMENDATION:** A structured safety training program should be developed, and a master safety training calendar produced.

Training topics should also be selected based on past experiences of the company, as well as experiences of other companies in the tower erection industry, and across all industry lines. Information on regulatory violations is very easily accessed via the Internet, and allows a mechanism for the company to learn from other people's mistakes. For example, a search on the OSHA website for common fines and citations will recognize Hazard Communication violations as one of OSHA's top five commonly cited areas. Information is also usually available through training programs offered by vendors to the company, as well as through the Workers Compensation insurance company. Having this information available, XYZ Company, Inc. can be proactive in making sure their Hazard Communication program is well written, that training requirements are met, and that compliance is ongoing in each building. Again, the opportunity exists to achieve this goal through effective use of the safety committee.

**RECOMMENDATION:** Based on this information, the following ongoing training programs are recommended for consideration:

- Protection from bloodborne pathogens
- Control of hazardous energy (lock out / tag out)
- Hazard communications
- Personal protective equipment
- Safe lifting practices
- Fire safety / emergency preparedness
- Weather emergencies
- Site security
- OSHA 10 Hour for the Construction Industry
- The supervisors role in accident investigation
- Motorized industrial vehicles (forklift operators)
- RF Safety
- Tower rescue and competent climber
- Site safety and hazard awareness

These topics are but an example of the various types of training programs that should be provided throughout the company. Obviously, not all employees are going to require all of these training programs. Training needs for all job categories should be assessed, regulatory and statutory requirements identified, and training programs developed and provided.

**RECOMMENDATION:** A training needs assessment should be conducted for each job description that exists, and a cumulative needs schedule developed.

Safety training for tasks that require manual dexterity should include a demonstration by a qualified instructor, and return demonstrations by the employee. Return demonstrations should be repeated until safe work practices are mastered.

#### **4. Policy Manual Review**

As part of the assessment process, SWA reviewed the Company Safety Manual for XYZ Company, Inc, and offers the following comments regarding that manual:

- a. The company has a cash safety award program that pays cash rewards to craftsmen who work the quarter with no recordable injuries. If this program is working for the company, so be it. Many companies have had little or no success with cash

incentives, finding that rather than motivate an employee to follow safe work practices, they instead deter the employee from reporting when accidents and injuries do occur.

- b. While very complete in content, some of the policies appear to have been copied from other sources. XYZ Company is encouraged to develop a standard policy format, and to convert all policies into this format, in order to provide consistency throughout all policy manuals.
- c. The Controlled Substance policy is very thorough and well written. It needs the signature of the CEO attached to the document.
- d. The “Field Safety Issues” policy prohibits the use of a “common drinking cup” but fails to identify an acceptable alternative.
- e. The policy on Personal Protective Equipment is missing the front page. In addition, in reviewing this policy, the following was noted:
  - i. The section on hardhats should address proper wearing of the hardhat
  - ii. The section on Foot Protection fails to identify what is required

The section on Hearing Protection states that hearing protection will be “worn as needed” but provides no direction to the employee on how to determine if it is needed