Section II - 10-Step Business Plan

1. Visible, active senior management leadership

Visible senior management leadership promotes the belief that the safety management is an organizational value.

Requirements

Contemporary businesses establish safety and health as a core value of their organizations. Senior management, including the top executive on site, must act as role models for how all employees should work to create a safe work environment. Active leadership includes:

- Authorizing the necessary resources for accident prevention;
- Discussing safety processes and improvements regularly during staff or employee meetings;
- Ensuring management is held accountable for accident-prevention activities and for managing accident-prevention processes;
- Annually assessing the success of the safety process by using surveys, personal interviews and/or behavior-sampling;
- Encouraging employees to take an active part in maintaining a safe workplace.

Implementation

Senior management will assume a leadership role in establishing the importance of safety in all operations. Taking the safety and health lead, management helps in the campaign to reduce accident losses. Senior management s leadership, support and active commitment encourage management and employees to make the safety and health system and processes successful.

Senior management can take these actions to show active leadership in the safety and health processes:

- Issue a written safety policy as a core value of the organization and assign roles and responsibilities;
- Establish both annual and long-term safety goals;
- Include safety as an agenda item in all regularly scheduled business meetings;
- Regularly review progress of the safety and health processes with supervisors and employees;
- Accompany supervisors, safety team members or safety committee members during periodic departmental safety surveys;
- Review and discuss all accident-investigation reports with the supervisor or foreman;
- Present safety recognition awards to deserving employees;
- Openly discuss safety issues with employees during periodic tours or meetings;
- Participate as a student in employee safety training programs;
- Participate in meetings with accident-prevention coordinators;
- Review minutes of safety team or committee meetings;
- Review safety survey reports.

2. Employee involvement and recognition

Employee involvement and recognition afford employees opportunities to participate in the safety-management process.

Requirements

To ensure the effectiveness of the program, both management and employees will participate in the safety and health-management process.

Employee participation opportunities can include:

- Safety and health involvement teams, focus groups, or safety and health committees;
- Accident investigations;
- Safety and health audits;
- Acting as instructors for safety and health training programs.

Recognition opportunities can include:

- Recognizing employees for excellence in accident prevention;
- Recognizing employees for consistently high contribution to safety and health;
- Recognizing employees for their contributions to continuous improvement through participation in problem-solving, decision-making or perception surveys;
- Recognizing employees who suggest safety and health improvements or complete safety and health projects.

Implementation

Labor/management safety and health teams facilitate dialogue on safety and health matters between management and non-management employees. The safety involvement team handles problem solving and decision making for safety and health issues confronting the company. Team composition includes management and direct labor employees in roughly equal numbers. Team members represent all areas of the company and participate as equals. Teams may be natural work groups, associated with a single function area, or cross-functional and represent a variety of different work areas.

Objectives include:

- Prepare and make available records of the safety and health issues, and outcomes discussed during meetings;
- Use recognized problem-solving techniques, like brainstorming, cause-and-effect diagrams, decision analysis, charting, etc., to reach effective solutions;
- Review investigations of accidents and causes of incidents resulting in injury, illness or exposure to hazardous substances, and recommend specific action plans for prevention;
- Recommend specific actions to take in response to employee safety suggestions;
- Conduct surveys of the safety culture every 12 to 18 months.

The team should meet regularly, but not less than quarterly with the facilitator, a member of the team who schedules the meeting, arranges for a meeting place and notifies members of the meeting. Rotate the facilitation role frequently and share responsibility for other team functions among team members. Record the minutes of each meeting and distribute the minutes to all team members. Post a copy of the minutes on the company safety bulletin board.

Giving the safety team the responsibility to make decisions and the accountability for implementing solutions is important. Empower the team to be responsible for developing and implementing effective safety solutions.

Team members require education in a variety of areas, such as team building, conflict resolution, interpersonal skills, problem-solving and decision-making skills, to fulfill their responsibilities productively. It takes time, mistakes will occur, but the team will learn and improve if afforded the opportunity and education.

Recognition

Two methods that encourage employees to use safe work practices and to integrate safety into the fabric of their jobs are:

- Positive safe behavior reinforcement   recognize employees for their actions in integrating safety into business operations and making the right decisions. Expressing gratitude and complimenting employees for their safe performance encourages continued safe behaviors;
- Negative safe behavior reinforcement   discipline employees for their actions and poor decisions. Disciplining discourages unsafe behaviors and decisions, and prevents that behavior in the future.

Companies use both positive and negative reinforcement to encourage its employees to perform their jobs safely. However, the tendency is to dwell on the negative, which leads to fault finding and blaming employees. Thus, safety is perceived as a negative by supervisors and employees. Heavily involving employees and using safe-behavior reinforcement develops a positive approach to managing the safety process.

Supervisors should use positive, safe behavior reinforcement to recognize employees safe behavior. You may consider asking supervisors to recognize and praise at least one employee each day for following prescribed safe work practices or contributing support to the accident-prevention systems. Recognition costs nothing, but is a visible reminder of the importance the supervisor and the organization place on integrating safety into the culture of the organization and into day-to-day operations.

3. Medical treatment and return-to-work practices
    Early return-to-work strategies help injured or ill workers return to work.

Requirements
    Employers will establish a post-injury or disability management policy and procedure consistent with the Health Partnership Program (HPP) to help injured or ill employees obtain quality medical care and return to work.
    Components of the disability management procedure will include, at a minimum:
- Informing employees of procedures for obtaining medical treatment, including informing employees of the selected managed care organization (MCO);
- Immediate reporting of injuries and illnesses to a supervisor;
- Regular communication with injured employees who are off work;
- Investigation of all injuries or illnesses within 24 hours to identify process and corrective measures;
- When not prohibited by labor agreement, a modified-duty or transitional-work program that allows employees to return to work in a productive capacity during the recuperative period.

Implementation
    Quality medical care provided in a timely manner helps injured or ill employees and promotes claims cost containment . Establishing effective working relationships with health-care providers is crucial for overall success.
    Take the following steps to facilitate the medical process and provide early intervention and successful medical management:
- Create effective open lines of communication with a clinic, hospital or physician;
- Educate health-care providers about the nature of your business, its risks and your control strategies;
- Build strong working relationships with health-care providers so each party understands roles, responsibilities and expectations.

Requirements
    Establish a pre-injury planning process to assist workers in minimizing the impact of work-related injuries or illness. Components of the pre-injury planning process will include:
- Educating workers and supervisors on safety procedures and acquainting them with the workers compensation system and company process;
- Developing a company remain-at-work plan that creates a worksite job analysis for each worker or job classification. This documentation provides guidelines for decision-making in the development of modified- or transitional-duty programs with the ultimate goal of helping the injured worker remain at work post injury;
- Communicating, monitoring and evaluating the company s remain-at-work plan.

    Establish a post-injury or disability management policy to help injured or ill workers obtain quality medical care and return to work quickly. This return-to-work plan will clearly outline strategies for returning workers to active status after injury or illness as soon as medically feasible. Components will include:
- A process for the worker to immediately report a work-related injury or illness to his or her supervisor;
- Procedures for the worker to obtain quality, timely medical treatment;
- A procedure for the employer to manage the workers return to the work site. This includes regular communication with injured employees who are off work;
- A process for the employer to determine the worker s readiness to return to work in conjunction with the worker s medical and/or rehabilitation provider;
- A method for the employer to monitor the worker upon return to work to reduce potential of re-injury;
- A process for the employer to investigate all injuries or illnesses within 24 hours to identify process improvements and corrective measures;
- A course for implementing a modified- or transitional-duty program when not prohibited by a labor agreement that allows workers to return to work in a productive capacity during the recuperative period.

Implementation

Quality medical care provided in a timely manner helps employees who are involved in an accident or illness and promotes overall claim cost containment.

Taking a proactive approach and establishing effective working relationships with the involved health-care and rehabilitation providers is crucial for overall success. The following steps facilitate the medical process and serve as the foundation for early intervention and successful medical management:

- Develop open lines of communication with the clinic, hospital, physician or rehabilitation provider most likely to provide services to your workers;
- Educate the providers regarding the nature of your business, its risks, and your remain-at-work/return-to-work strategies so they understand your operational goals and expectations of them in this process.

A worksite job analysis will be a valuable tool to develop modified- or transitional-duty programs. Develop and communicate the worksite job analysis prior to injury. You may use a rehabilitation specialist, such as an occupational therapist to create the analyses and provide recommendations for physically appropriate modified duties given the injured workers functional capabilities.

Include the following attributes of the workers responsibilities in each analysis:

- Job description, including task details;
- Detail of tools and equipment used;
- Work schedule;
- Analysis of physical demands for required tasks;
- Other special demands.

Using the worksite job analysis, you can implement an effective modified- or transitional-duty program. Such a program facilitates a worker's return to work as soon as he or she can work in a productive capacity.

Once you establish the modified-duty process, should an injury or illness require a worker to be away from work for an extended period of time, actively help the employee to return to work as quickly as possible. Work closely with the worker s health-care provider, rehabilitation specialist and claim administrator to determine the best possible solution for each individual worker. This may include:

- Comparing the employee s functional capabilities to the stated job requirements;
- Deciding to what extent you can modify the job;
- Identifying other modified-duty opportunities on a limited or full-time basis, if modification of the worker s original job is not possible.

The expected outcomes of implementing these requirements are:

- Reduced time lost from work;
- Reduced productivity loss;
- Improved return-to-work rate;
- Reduced worker re-injury;
- Increased worker satisfaction.

4. Communication

A program of regular safety and health communication issues keeps employees informed and solicits feedback and suggestions.

Requirements

Each organization s approach to managing safety and health will include regular verbal and written communication on matters affecting employee safety and health.

Communications will include:

- Quarterly written and/or verbal feedback to all employees on their accident-prevention performance;
- A process for upward communication and downward communication throughout the organization;
- Communication can include memos, bulletin boards, staff and general meetings;
- Feedback should include the organization s overall safety and health performance.

Implementation

Safety communication is a two-way process between employer and employees. Many traditional safety programs emphasize top-down communication and virtually overlook communication from the bottom up. To have an effective safety program, you must incorporate a bottom-up communication process.

Encourage employees to identify obstacles to safety without fear of reprisal. It is crucial that you develop and nurture a system of open and honest communication for a safety culture to evolve.

Soliciting employee input and participation on safety and health matters will do more than simply help the organization communicate more effectively.

Encouraging employees to share their ideas and concerns on safety and health matters, and asking them for their help in decision-making and problem-solving will help them not only feel in on things, but actually contribute to successful outcomes. High morale and productivity also result.

Communication with employees needs to be easily understood. If you have languages other than English spoken in your facilities, communicate safety and health communication to employees in the language they understand. In addition, some employees may not read, requiring verbal communication.

Whatever communication strategies you use, it is important that employee concerns and suggestions receive timely and appropriate responses. It also is important that employees feel they are being heard and that their opinions matter.

The following communication ideas will help you design your communication systems and processes:
- One-on-one discussion the supervisor, foreman or team leader sits down with each employee on a scheduled basis to discuss safety concerns, suggestions and ideas. Dialogue can last from 10 minutes to one hour. Ideally, discussions should be monthly, but should not be less frequent than every quarter;
- Informal discussion inform employees that the accident-prevention coordinator, supervisor and/or team leader is available to discuss confidentially their safety and health questions, problems and suggestions;
- Suggestions establish a safety and health suggestion program. Install a safety suggestion box in the work area and ask employees to contribute their comments and suggestions. Consider providing a form for employees to use when submitting their suggestions.
- Group discussion provide the opportunity for executives, supervisors, team leaders and employees to discuss safety issues at employee gatherings. Regularly schedule meetings to share information and seek input on safety and health matters. Meetings offer an opportunity to use problem-solving and decision-making techniques, as discussed for labor/management safety teams on page 6. Meetings can be formal or informal, held in a conference room or on the job site, last long or be done in 10 minutes.
- Written communication communicate key information, which can be motivational, developmental or informative, in writing;
- In-house company publications an in-house company newsletter provides accident-prevention information on a regular basis;
- Safety and health booklets provide safety and health information to employees at work or mail to their homes;
- Safety alert notices inform employees of accident causes and how they can prevent them. Discuss the alert notices with employees, post notices on the safety bulletin board or send them to individual employees;
- Memorandums summarize discussions and plans, provide information on performance goals and expectations, and give feedback on safety performance;
- Postings:
  - Safety bulletin boards use for posting safety-related policies, notices, articles, meeting schedules, meeting minutes, memos, etc.,
  - Safety signs a constant reminder of safe work practices, dangerous conditions and special precautions. Safety signs are often posted as reminders on machinery, entrances to work areas and in high hazard areas.

5. Timely notification of claims

Requirement

Employers must report claims immediately to the MCO, which reports the claim to BWC within 24 hours. The employer will comply with all requirements for reporting claims to the employer's MCO as specified under the HPP rules.

Implementation

When an injury occurs, first arrange for medical care for the employee. Next, investigate and document the circumstances, and report the injury to the claim handler.

Reporting claims quickly:
- Demonstrates care and concern for the employee;
- Prevents delays and/or confusion in the claim process;
- Reduces the potential for fraud or abuse;
- Reduces the potential for needless litigation.

Through timely reporting of claims, you:
- Establish an open line of communication;
- Develop accurate information to manage the workers' compensation claim;
- Provide benefits to the injured employee on a timely basis,

6. Safety and health process coordination
Assign the role of coordinating safety efforts for the company.

Requirements
Designate an employee as the accident-prevention coordinator. Give that person the responsibility and authority to facilitate organizational safety systems and processes, and ensure that he or she develops the knowledge and skills necessary for creating a safer working environment.

The accident-prevention coordinator does not assume operational responsibility for safety and health, but supports line management, supervision and employees to develop effective safety systems and processes.

In addition, the accident-prevention coordinator is required to attend at least one BWC approved safety and health management course yearly.

Responsibilities include:
- Helping management and employees identify accident prevention and safety and health training needs through perception surveys, interviews, behavior sampling or other similar methods;
- Helping supervisors make changes or develop strategies that improve the organization's safety systems and processes;
- Identifying and communicating new safety and health requirements;
- Compiling injury and illness-related records;
- Tracking progress on safety and health-related projects;
- Working with employees to optimize safe work practices
- Attending at least one BWC approved safety and health management course yearly..

You may choose to delegate the accident-prevention coordinator s functions to more than one person. A small business owner may assume the duties or have a manager do them in addition to his or her normal management duties. Geographically dispersed companies usually name a local employee as the accident-prevention coordinator. Medium-sized employers often designate a department manager from the human resource, engineering or financial services disciplines as their accident-prevention coordinator.

Larger companies often employ a full-time accident-prevention coordinator. When determining the need for a full-time accident-prevention coordinator, consider the accident history, expenses associated with accidents and the degree of hazard inherent in the operations.

As mentioned, accident-prevention coordinators must attend at least one BWC approved safety and health management course each year to meet the requirements of step 6. BWC s Division of Safety and Hygiene offers several courses that meet this requirement. An employer may select a course that best addresses his or her needs. To obtain more information, call 1-800-OHIOBWC and press 22.

The accident-prevention coordinator should be committed to safety and health, employee well being and have the time, authority and resources to facilitate developing the company's safety systems and processes. He or she acts as the internal consultant helping the organization make important safety-related decisions.

Attending at least one safety management course each year allows the accident prevention coordinator to:
- Increase expertise in safety systems and processes;
- Renew/refresh thinking on how to develop successful management approaches;
- Provide opportunity to understand how others are coping with similar challenges.

Document all BWC approved safety and health management courses the accident-prevention coordinator attends. The accident-prevention coordinator is an internal consultant, not a doer. Line managers and supervisors carry out many of the activities that make up the safety and health system. The accident-prevention coordinator provides advice and support to line managers, supervisors and employees regarding safety management responsibilities. An accident-prevention coordinator's specific functions may vary from company to company.

7. Written orientation and training plan
Conduct orientation and training for all employees.

Requirements
Identify and respond to the specific training needs of your employees, including supervisors, managers and team leaders. Develop a written safety and health training plan that documents specific training objectives and instruction procedures.
The safety and health training plan will include:
- Company safety and health policy statement;
- Employee responsibilities.

Safety and health training will include:
- Hazard communication;
- Bloodborne pathogens, if applicable;
- Specific job/task safe work practices and hazard recognition.

At a minimum, training must cover:
- Procedures for the safe and efficient use of machinery and tools;
- Ergonomic risk factors, including the prevention of cumulative trauma disorders;
- Chemical hazards and how to prevent contact or exposure;
- If appropriate, procedures for lockout-tagout, hot work permits and confined-space entry.

The employer will document all training and include the date, topics covered, instructor s name and the names of employees attending the training session. On the day training is completed, have each attending employee sign the documentation form.

Implementation
No matter how safe a work environment you provide, the success of your safety and health systems depends upon the managers, supervisors, team leaders and employee buy-in of safe work practices.
The goal of any safety and health training program is not just to impart knowledge, but also to change behaviors and improve one s ability to make good decisions. Through safety training, employees receive information about hazards, procedures, processes and expected behaviors.
Bureau of Labor Statistics studies have found that 48 percent of all injured workers had been on the job for less than one year. Therefore, you should assume that new employees know little or nothing about the job hazards and processes associated with their job functions.
After your new employees participate in safety orientation have their supervisors provide them with job-specific safety and health training. Do not permit employees to start a job until they have received instructions on how to perform the work safely. It is recommended that at least three days be given to this to ensure the training is understood and proper procedures are being followed.

Other than new employees, participants also will provide training in the following instances:
- Provide employees with a general safety and health orientation, and job-specific safety and health training, similar to the orientation and training provided to new employees;
- Have the supervisor provide employees who are given a new job assignment or transfer with the same job-specific safety and health training as if they were new employees. Often, transferred employees are not given safety training because they are only temporarily filling in for the regular employee. Temporary employees must be trained or the potential for an accident is increased.
- Conduct safety and health training before or at the time of introducing new substances, equipment, processes or procedures. Training may be an informal toolbox safety meeting held at the workplace. The training must be responsive to changes in the work environment.
- Provide safety training whenever you identify a new or previously unrecognized hazard. Teach employees who may be exposed to the hazard how to protect themselves. Also encourage employees to report potential hazards immediately.

In addition, it is important to build supervisor and manager competency levels in safety and health. As they learn more about effective safety process management and emphasize it, employees are less likely to be injured or become ill from inherent hazards. Developing managers , supervisors and team leaders effective safety process management in contemporary safety management may contribute to higher profitability levels. Improving communication, team building, interpersonal and problem-solving skills elevates management performance levels and also may contribute to higher profits.
Fully document your safety and health training by including the date, topics covered, instructor s name, and the names of employees attending the training session. Have employees answer written questions about the content of educational material that was presented. This helps provide a sense of importance to the training,

measures understanding and retention of the material and documents the effectiveness of the training. It also provides the opportunity for constructive feedback from the employees. Have each employee in attendance sign the documentation form on the day of completion.

8. Written and communicated safe work practices

Publish safe work practices so employees have a clear understanding of how to accomplish their job requirements safely.

Requirements

Guidance for employees in the form of written safe work practices is important so they have a clear understanding of job requirements and responsibilities. Identify, document and publicize both general and job-specific safe work practices. Provide employees with a copy of the general safe work practices, and have all employees sign a statement indicating they have read and intend to follow the safe work practices.

Examples of general safe work practices expected of employees include:

- Practicing good housekeeping;
- Wearing personal protective equipment;
- Applying first-aid procedures (if trained);
- Using good ergonomic principles;
- Wearing respiratory protection;
- Using and following lockout/tagout procedures;
- Using and following confined-space entry;
- Using hazard communication;
- Avoiding bloodborne pathogens, if applicable.

Job-specific, safe work practices apply to operations that involve recognized hazards and address risks associated with the business. Post or publicize job-specific safe-work practices in the work area.

Implementation

Safe work practices are essential for any organization because they prescribe the accepted behavior and practices the employer expects of employees. You may use a safety involvement team to develop an employee safety handbook. Ask employees for their input in composing the handbook. Include general, company-wide safe work practices and specific safe work practices that apply to each department, the company's safety policy or a statement on safety as viewed by the top official of the organization in the safety handbook.

Each department manager, leader, etc., will review the safe work practices with his or her employees on a recurring basis, at least annually.

To help ensure that safe work practice handbooks are read, have employees sign a statement certifying that they have read it, they are familiar with the safety rules and policies outlined in the safety handbook and agree to abide by them. Retain the signed document in the employee s personnel file.

9. Written safety and health policy

A written safety and health policy signed by the top company official expresses the employer s values and commitment to workplace safety and health.

Requirements

Give all new hires a safety and health policy document signed by the company s top executive. Communicate the safety and health policy to all employees and review it with them on an annual basis. The document will include:

- Manager, supervisor, team leader and employees responsibilities regarding the organization s commitment to workplace safety and health;
- Commitment to returning injured or ill employees to work at the earliest opportunity.

Implementation

A written safety and health policy clearly states the company s commitment to effective safety process management and to providing a safe working environment.

This may seem to be a minor step, but it is often the start in implementing effective safety and health systems and processes. It expresses the commitment to providing and maintaining a safe work environment.

Communicating the organization's commitment to safety is as important as the company's statement on producing quality products. Both statements should be mutually supportive. Consider integrating each statement into one comprehensive policy. Employees would benefit from seeing the integration of safety and quality.

10. Recordkeeping and data analysis

Internal program verification assesses the success of company safety efforts to include audits, surveys and record analysis.

Requirements

Compile injury and illness-related data to:
- Identify safety and health process problems;
- Help manage the compensation process;
- Provide information necessary for developing solutions.

Implementation

Good injury and illness records are an essential component of successful safety and health systems. Assessing why accidents occur, what specific systems or processes need changed and how to make changes are this step s goals.

Detailed statistical analysis is not necessary, but comparing injury and illness experience with preceding periods and comparing your results to the results of similar companies are important. Results-oriented data, frequency rates, severity rates and costs of compensation indicate trends. However, these numbers do not reveal system weaknesses, poor decisions or inappropriate behaviors.

Performance-oriented information helps identify system weaknesses and shows you where you need to make improvements. Therefore, it is important to measure and assess the processes by which you obtain results.

The processes may include:
- Conducting perception surveys;
- Assessing the effectiveness of the accountability system;
- Using an observation system that develops information on safe behaviors in the work setting;
- Assessing the effectiveness of the communication and/or training processes.

An effective way to use performance-related safety data is to track and post successful performance information. Typically businesses process related data to be used for statistical analysis. It also is helpful to track safety performance. Charts are effective for displaying this information.

Process recordkeeping and charting opportunities that you can track by timeframe, such as monthly, include:
- Types and number of unsafe behaviors observed by supervisors or employees;
- Number of safe behavior recognition communications by supervisors or employees;
- Number of safety discussions conducted;
- Number of reported near misses reported;
- Number of dangerous operations completed successfully, such as lockout/tagout operations;
- Number of safety suggestions and problems solved;
- Number of safe miles driven without incident.

Use the list above to customize meaningful performance measures for your business.

Over time, your database shows changes in critical behaviors. By comparing month-to-month or year-to-year data, a picture of actual performance is revealed. This technique incorporates statistical process control into the organization's safety system. As a result, critical problem areas become noticeable. From this information, you can identify needs with a high degree of confidence and develop improvements to enhance the organization s safety systems and processes.