

SAFETY / OSHA UPDATE

A Newsletter from High Safety Consulting Services, Ltd.

Information on Safety & Health in Your Workplace



Independence Day Month – 2003

FREEDOM RINGS!

In light of our nation's up-coming birthday, I thought I might postulate a bit about independence – not of the nation, but within an organization as it relates to the safety and health function. There are lots of management theories out there about “how” to manage safety. How much control do you retain over the safety and health function? How much do you turn over to the troops to handle?

This is a delicate balance, especially in a corporate role where on one hand you want to provide support and encouragement, while on the other you must control the risks to which the organization is exposed. Often the Safety function is held responsible for “increasing accident rates,” and this tends to place a desire for more authority and control into the safety department. Strong central control, rule by fear, and directives can work quite well in terms of controlling accidents. The result: people are upset, unsettled, and seek to go around the system, but only if they can do it without getting ‘caught’. Near misses (especially those with individual culpability) are often not reported in this environment. Open and consultative approaches allow people to develop their own ideas, create their own programs, and interpret policy for individual operating units. The result: More involvement, more ownership, happier people....but possibly disjointed safety procedures that are not adequately protective.

Suggestions for those trying to balance these two objectives:

- 1) Make sure that operational units are responsible for their safety performance – NOT THE SAFETY DEPARTMENT!
- 2) Make sure that everyone understands the Safety Function is to support and assist the managers and supervisors in doing their jobs.
- 3) Provide a guiding list of “absolutes” that must be adhered to in terms of operational policy. Always be willing to listen to new ideas and to challenges of the absolutes, because nothing IS ‘absolute’ (The autocratic side – and a certain amount of this is required for effectiveness)
- 4) Allow independence of the operational units. Encourage, support, and most importantly develop common metrics that will allow comparison of operational unit performance (to themselves and the rest of the organization). Measure and Report.
- 5) Communicate, Communicate, Communicate – In marketing we are told it takes double digit contacts until a message is perceived. The safety metrics need to be easy for everyone to understand, and they need to be communicated over and over and over and
- 6) Accountability – Work to establish accountability into existing accountability systems. If accountability systems are lacking, work with the organization to establish them. Accountability for operational, performance-based measures (controlled by operations) must not rest in the Safety department.

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7) Get to independence -- Operational units have more knowledge and control over the safety program than you! – This is tough for safety pros who like being the ‘expert’ – including myself. Success is when the plant manager or supervisors come up with a process or procedure that improves safety of the operation – and you had nothing to do with it!

8) Here are some opposites that might provide some thoughts about how the safety function is managed:

Do you more often APPROVE projects or PROVIDE INPUT ON them?

Do you more often seek DISCIPLINARY ACTION or PREVENTATIVE MEASURES?

Do you lead the organization TO SAFETY or does the organization LEAD ITSELF?

Are you TEACHING others or TELLING others what to do?

Who OWNS the safety process: OPERATIONS or the SAFETY DEPARTMENT?

Who is accountable for safety performance: OPERATIONS or the SAFETY DEPARTMENT?

RECORDKEEPING 300 FORM UPDATE:

OSHA has determined that the current 300 Log will NOT be altered to include a musculoskeletal disorder (MSD) column. Initially OSHA had a MSD column but proceeded to remove it after complaints and the revocation of the ergonomics standard.

LOCKOUT INJURY RESULTS IN FINES:

A N.J. company faces proposed penalties of \$130,000 for a Dec.2002, accident in which an employee suffered an amputation of three fingers while helping another worker to clean a cement mixer. OSHA issued six repeat violations with a proposed penalty of \$117,500, three serious violations with a penalty of \$12,500, and three other-than serious violations with no penalty. The company did not conduct a periodic review of lockout/tagout procedures or verify that the procedures were being followed. There were other violations as well. This is one I find many companies are missing! – An inspection of the lockout tagout procedures conducted ANNUALLY on each lockout procedure and involving EACH AUTHORIZED person in one of the ANNUAL inspections. This process audits the procedures AND the authorized personnel. If you would like a free form for these inspections, let me know – I can forward it to you on e-mail. (This is not required for construction contractors.)

ARE YOU AT HIGH-RISK FOR OSHA INSPECTION?

OSHA announced the new site-specific targeting (SST) plan that will target high-hazard worksites for unannounced comprehensive safety and health inspections in 2003. This program became effective June 16 and covers about 3,200 worksites on the primary list that reported 14.0 or more injuries or illnesses resulting in lost work days or restricted activity for every 100 full-time workers (known as the LWDII rate). For the first time, sites will also be targeted based on a "Days Away from Work Injury and Illness" (DAFWII) rate of nine or higher (nine or more cases that involve days away from work per 100 full-time employees). Employers who reported LWDII rates of between 8.0 and 14.0, or DAFWII rates of between 4.0 and 9.0, will be placed on a secondary list for possible inspection. The average LWDII rate in 2001 for private industry in the nation was 2.8; the average DAFWII rate was 1.7.

Are you on the list? → Here's the Link to Check: (You will need WinZip to open this)
www.osha.gov/as/opa/foia/hot_9.html

High Safety can conduct a compliance review before OSHA does!

ORDER ON-LINE:

With our enhanced e-commerce site, you can order OSHA standards, register for classes, and even pick-up an AED! We want to offer our customers unique products that solve safety and health problems. Are there items you would like, but just can't seem to find? We are looking for problem-solving products to add to our electronic catalog. Your suggestions are welcome.

UPCOMING PROGRAMS:

Ergonomics Principles at Lancaster Chamber. July 16. Morning session 8:30-Noon. Call Lancaster Chamber for information at 717-397-3531 or visit www.thechamber.net/cgi-bin/foxweb.dll/commcale/99calemain?cc=lcci

OSHA 10-Hour Construction Course at ABC. July 24 and 25. Morning sessions, both days. Call ABC for more information. 717-653-8106. Held at ABC in Manheim, PA

CPR / First Aid Class at High Industries, Inc. sponsored by the Lancaster Chamber. August 7. All day. Call the Lancaster Chamber for more information or visit the website link:
www.thechamber.net/cgi-bin/foxweb.dll/commcale/99calemain?cc=lcci&sd=07/01/2003&action=next

OSHA 30 Hour General Industry Course at High Industries, Inc. Sept 8 to 12. Perfect if you need a complete education in safety. Great for safety personnel, HR Managers, supervisors. Call for more information or visit www.highsafety.com

OSHA 10 Hour General Industry Course at High Industries, Inc. Oct 20 to 21. Great for safety committee members, supervisors, everyone! Call for more information on register on-line: www.highsafety.com

Forklift Classroom Training Course at Lititz Community Center via Lancaster Chamber. Call Chamber for more information on visit their website. Contact information is available above. 9-19-03 - Morning Session.

OSHA Construction Instructors Class 500 at High Industries, Inc. offered through the Keystone Occupational Safety and Health Center (KOSH), an OSHA Training Institute. 9-22-03 to 9-25-03. Pre-requisites must be met. Call 800-318-4846 or register: www.koshcenter.org

OSHA 311 Fall Arrest Systems at High Industries, Inc. offered through KOSH Oct 6-8. Contact information above.