



RECOMMENDED PRACTICES FOR SAFETY & HEALTH PROGRAMS OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION

PART 3

Program Evaluation and Improvement

PROGRAM EVALUATION AND IMPROVEMENT

ONCE A SAFETY and health program is established, it should be evaluated initially to verify that it is being implemented as intended. After that, employers should periodically, and at least annually, step back and assess what is working and what is not, and whether the program is on track to achieve its goals. Whenever these assessments identify opportunities to improve the program, employers, managers, and supervisors—in coordination with workers—should make adjustments and monitor how well the program

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

The infographic includes a circular diagram with the following segments:

- PROGRAM EVALUATION AND IMPROVEMENT**: Assess program effectiveness and modifications needed.
- SUPPLIER WORKS**: Evaluate safety and health performance of suppliers.
- MANAGEMENT**: Evaluate management's commitment and resources.
- WORKERS**: Evaluate worker participation and knowledge.
- TRAINING**: Evaluate training effectiveness.
- SAFETY AND HEALTH PROGRAM**: Evaluate overall program performance.
- HAZARD PREVENTION AND CONTROL**: Evaluate hazard identification and control measures.

PROGRAM EVALUATION and improvement includes:

- Establishing, reporting, and tracking goals and targets that indicate whether the program is making progress.
- Evaluating the program initially, and periodically thereafter, to identify shortcomings and opportunities for improvement.
- Providing ways for workers to participate in program evaluation and improvement.

Action item 1: Monitor performance and progress

The first step in monitoring is to define indicators that will help track performance and progress. Next, employers, managers, supervisors, and workers need to establish and follow procedures to collect, analyze, and review performance data.

Both *lagging* and *leading* indicators should be used. Lagging indicators generally track worker exposures and injuries that have already occurred. 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.

How to accomplish it

- Develop and track indicators of progress toward established safety and health goals.
 - Track *lagging indicators*, such as:
 - 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
 - Track *leading indicators*, such as:
 - 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 and severity of hazards identified during inspections
 - Number of workers who have completed required safety and health training
 - Timely completion of corrective actions after a workplace hazard is identified or an incident occurs
 - Timely completion of planned preventive maintenance activities
 - Worker opinions about program effectiveness obtained from a safety climate or safety opinion survey
- Analyze performance indicators and evaluate progress over time.
- Share results with workers and invite their input on how to further improve performance.
- When opportunities arise, share your experience and compare your results to similar facilities within your organization, with other employers you know, or through business or trade associations.

Note: Indicators can be either quantitative or qualitative. Whenever possible, select indicators that are measurable (quantitative) and that will help you determine whether you have achieved your program goals. The number of reported hazards and near misses would be a quantitative indicator. A single worker expressing a favorable opinion about program participation would be a qualitative indicator.

Action item 2: Verify that the program is implemented and is operating

Initially and at least annually, employers need to evaluate the program to ensure that it is operating as intended, is effective in controlling identified hazards, and is making progress toward established safety and health goals and objectives. The scope and frequency of program evaluations will vary depending on changes in OSHA standards; the scope, complexity, and maturity of the program; and the types of hazards it must control.

How to accomplish it

- Verify that the core elements of the program have been fully implemented.
- Involve workers in all aspects of program evaluation, including reviewing information (such as incident reports and exposure monitoring results); establishing and tracking performance indicators; and identifying opportunities to improve the program.
- Verify that the following key processes are in place and operating as intended:
 - Reporting injuries, illnesses, incidents, hazards, and concerns
 - Conducting workplace inspections and incident investigations
 - Tracking progress in controlling identified hazards and ensuring that hazard control measures remain effective
 - Collecting and reporting any data needed to monitor progress and performance
- Review the results of any compliance audits to confirm that any program shortcomings are being identified. Verify that actions are being taken that will prevent recurrence.

Action item 3: Correct program shortcomings and identify opportunities to improve

Whenever a problem is identified in any part of the safety and health program, employers—in coordination with supervisors, managers, and workers—should take prompt action to correct the problem and prevent its recurrence.

How to accomplish it

- If you discover program shortcomings, take actions needed to correct them.
- Proactively seek input from managers, workers, supervisors, and other stakeholders on how you can improve the program.
- Determine whether changes in equipment, facilities, materials, key personnel, or work practices trigger any need for changes in the program.
- Determine whether your performance indicators and goals are still relevant and, if not, how you could change them to more effectively drive improvements in workplace safety and health.

Note: The scope and frequency of program evaluations will depend on the scope, complexity, and maturity of the program and on the types of hazards it must control. Program evaluations should be conducted periodically (and at least annually) but might also be triggered by a change in process or equipment, or an incident such as a serious injury, significant property damage, or an increase in safety-related complaints.



Communication and Coordination for Host Employers, Contractors, and Staffing Agencies

COMMUNICATION AND COORDINATION FOR HOST EMPLOYERS, CONTRACTORS, AND STAFFING AGENCIES

IN TODAY'S ECONOMY, an increasing number of workers are assigned by staffing agencies to work at specific "host" worksites under the direction and control of the host employer. Examples include seasonal workers, such as delivery drivers and warehouse workers, who help fill a temporary staffing need, as well as office and production workers who may be placed in both short- and long-term assignments. In these situations, it is important for the staffing agency and the host employer to communicate and coordinate to provide and maintain a safe work environment for their workers.

In other situations, some workers are employed by a host employer and others by a contractor or subcontractor. 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. OSHA refers to these as "multiemployer" worksites. In these circumstances, it is important that each employer and contractor consider how its work and safety activities can affect the safety of other employers and workers at the site.

IN BOTH TEMPORARY WORKER and multiemployer situations, safety is enhanced if employers establish mechanisms to coordinate their efforts and communicate effectively to afford all workers equal protection against hazards. These mechanisms include measures to ensure that all workers on site (and their representatives) can participate in preventing injuries and illnesses. Failure to take these steps may undermine safety programs. For example, if the different employers have inconsistent policies for when and where to wear PPE, workers may mistakenly believe that the equipment is not needed, leading to injury. Inconsistent safety policies may also cause workers to question the credibility of safety and health programs, resulting in less meaningful employee engagement and participation.

Effective communication and coordination among such employers means that:

- Before coming on site, contractors and staffing agencies and their workers are aware of:
 - The types of hazards that may be present.
 - The procedures or measures they need to use to avoid or control their exposure to these hazards.

- How to contact the host employer to report an injury, illness, or incident or if they have a safety concern.
- Host employers and their workers are aware of:
 - The types of hazards that may arise from the work being done on site by workers employed by contractors or staffing agencies.
 - The procedures or measures needed to avoid or control exposure to these hazards.
 - How to contact the contract or staffing firm if they have a safety concern.
 - What to do in case of an emergency.

Definitions

Host employer: An employer who has general supervisory authority over the worksite, including controlling the means and manner of work performed and having the power to correct safety and health hazards or require others to correct them.

Contractor: An individual or firm that agrees to furnish materials or perform services at a specified price, and controls the details of how the work will be performed and completed.

Staffing agency: A firm that provides temporary workers to host employers. A staffing agency hires its own employees and assigns them to support or supplement a client's workforce in situations involving employee absences, temporary skill shortages, seasonal workloads, and special projects.

Temporary workers: Workers hired and paid by a staffing agency and assigned to work for a host employer, whether or not the job is actually temporary.

Action item 1: Establish effective communication

Each host employer establishes and implements a procedure to ensure the exchange of information about hazards present on site and the hazard control measures in place. Thus, all workers on the site are aware of worksite hazards, and the methods and procedures needed to control exposures to them.

How to accomplish it

- The host employer communicates with contractors and staffing agencies to determine which among them will implement and maintain the various parts of the safety and health program, to ensure protection of all on-site workers before work begins. These determinations can be included in contract documents that define the relationships between the parties.
- The host employer establishes and implements procedures to exchange information with contractors and staffing agencies about hazards present in the workplace and the measures that have been implemented to prevent or control such hazards.
- The host employer gathers and disseminates information sufficient to enable each employer to assess hazards encountered by its workers and to avoid creating hazards that affect workers on the site.
- Contractors and staffing agencies regularly give the host employer any information about injuries, illnesses, hazards, or concerns reported by their workers and the results of any tracking or trend analysis they perform.
- Each contractor establishes and implements a procedure for providing the host employer with information about the hazards and control measures associated with the work being done by its workers, and the procedures it will use to protect workers on the site.

- The host employer gives contract employers and staffing agencies the right to conduct site visits and inspections and to access injury and illness records and other safety and health information.
- The host employer communicates with contractors and staffing agencies and their workers about nonroutine and emergency hazards and emergency procedures.
- Information is communicated before on-site work starts and, as needed, if conditions change.

Action item 2: 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.

How to accomplish it

- Host employers:
 - Include in contracts and bid documents any safety-related specifications and qualifications and ensure that contractors and staffing agencies selected for the work meet those requirements.
 - Identify issues that may arise during on-site work and include procedures to be used by the host employer and contractors and/or staffing agencies for resolving any conflicts before work starts.
- Host employers coordinate with contractors and staffing agencies to:
 - Ensure that work is planned and scheduled to minimize impacts on safety.
 - Ensure that 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 and receive consistent safety information.
- Host employers and staffing agencies:
 - Work together to deal with unexpected staffing needs by ensuring that enough trained and equipped workers are available or that adequate lead time is provided to train and equip workers.
 - Make sure that managers with decision-making authority are available and prepared to deal with day-to-day coordination issues.

ABBREVIATIONS

CDC Centers for Disease Control and Prevention

NIOSH National Institute for Occupational Safety and Health

OSHA Occupational Safety and Health Administration

PPE personal protective equipment

PtD Prevention through Design

SDS Safety Data Sheet

SHARP Safety and Health Achievement Recognition Program

VPP Voluntary Protection Programs

GLOSSARY OF TERMS

close call/near miss: An incident that could have, but did not, result in death, injury, or illness. They signal that hazards are not being adequately controlled or that new hazards have arisen.

contractor: An individual or firm that agrees to furnish materials or perform services at a specified price.

elimination: A change in process or workplace condition that removes the hazard or ensures that no worker can be exposed to a hazard under any foreseeable circumstances.

hierarchy of controls: A system for selecting and implementing the most effective control solutions for workplace hazards that includes:

- Elimination.
- Substitution.
- Engineering controls.
- Administrative controls.
- Personal protective equipment.

This is known as the “hierarchy of controls” because they should be considered in the order presented. Controls at the top of the hierarchy are potentially more effective and more protective than those lower in the hierarchy.

host employer: An employer who has general supervisory authority over the worksite, including controlling the means and manner of work performed and having the power to correct safety and health hazards or require others to correct them.

industrial hygiene: The science of protecting and enhancing the health and safety of people at work and in their communities.

job hazard analysis: A technique that focuses on job tasks as a way to identify hazards before they occur. It focuses on the relationships among the worker, the task, the tools, and the work environment.

joint-employed A worker hired and paid by a staffing agency and assigned to work for a

worker:	host employer, whether or not the job is actually temporary.
lagging indicators:	Measures of the occurrence and frequency of events in the past such as the number or rate of injuries, illnesses, and fatalities.
leading indicators:	Measures intended to predict the occurrence of events in the future. Leading indicators are proactive, preventative, and predictive measures that provide information about the effective performance of safety and health program activities that can drive the control of workplace hazards.
metrics:	Measures of performance.
multiemployer worksite:	Any worksite where two or more employers are present. See OSHA's Multiemployer Citation Policy.
nonroutine operations:	Operations that do not occur frequently or that occur as a result of an emergency.
peer-to-peer training:	A type of on-the-job training where workers exchange information about hazards, controls, reporting procedures, and work procedures that are relevant to the safety and health program.
Prevention through Design:	A NIOSH national initiative to prevent or reduce occupational injuries, illnesses, and fatalities through the inclusion of prevention considerations in all designs that impact workers. PtD encompasses all of the efforts to anticipate and design out hazards to workers in facilities, work methods and operations, processes, equipment, tools, products, new technologies, and the organization of work.
quantitative exposure assessment:	Techniques used to quantitatively measure workers' exposure to hazards, particularly health hazards, such as sampling for chemicals, dusts, biological organisms, noise, radiation, or other assessments. The purpose of such assessments is to quantify the level of workers' exposure to a hazard. Also known as exposure monitoring.
root cause analysis:	A collective term that describes a wide range of approaches, tools, and techniques used to uncover causes of problems.
Safety and Health Achievement Recognition Program:	An OSHA program that recognizes small business employers who have used OSHA's On-site Consultation Program services and operate an exemplary injury and illness prevention program.
safety data sheet:	Written or printed material used to communicate the hazards of substances and chemical products to employees prepared in accordance with paragraph (g) of OSHA's Hazard Communication standard.
serious hazards:	Hazards that are causing or are likely to cause death or serious physical harm. See OSHA's Field Operations Manual, Chapter 4.
shortcoming:	A fault, deficiency, or gap that results in a failure to meet program design criteria.
staffing agency:	A firm that provides temporary workers to host employers. A staffing agency hires its own employees and assigns them to support or supplement a client's workforce in situations involving employee absences, temporary skill shortages, seasonal workloads, and special projects.
substitution:	The replacement of toxic or hazardous materials (or the equipment or processes used with them) with ones that are less harmful.

Voluntary Protection Programs: An OSHA initiative that recognizes employers and workers in the private industry and federal agencies who have implemented effective safety and health management systems and maintain injury and illness rates below the U.S. Bureau of Labor Statistics averages for their respective industries.

work practices: A set of procedures for performing a specific work assignment safely.

CONCLUDED

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