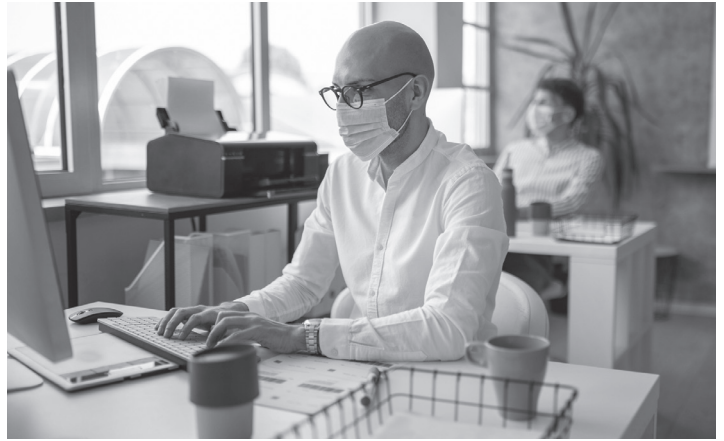


---

# Employer Reference Guide

---

## Workplace Safety Program



Know the people who know workers' comp.<sup>SM</sup>

MEMBER OF GREAT AMERICAN INSURANCE GROUP

---

# Table of contents

<b>Introduction</b> .....	3
<b>Getting started</b> .....	4
<b>Instructions by section</b> .....	5
<b>Recommendations</b> .....	10
<b>FAQs</b> .....	12

# Introduction

Creating your workplace safety program may seem daunting and confusing, but Summit is here to help. This guide will help you understand what needs to be included in your workplace safety program.

Written safety and health plans are an important part of a company's safety and health program. Not only does the Occupational Safety and Health Administration (OSHA) require companies to have written programs, but contractors may require safety and health programs as part of their pre-qualification process.

It's essential to have your company's safety plan in writing, as documentation to reference what the company's practices, rules and guidelines are for a variety of reasons—in case of an incident, audit or inspection. Safety and health training should be developed from the information contained in your written program. Having safety and health programs help strengthen your company's safety culture by prioritizing worker safety.

State Plans are OSHA approved workplace safety and health programs operated by individual states or U.S. territories. There are currently 22 State Plans covering both private sector and state and local government workers, and there are six State Plans covering only state and local government workers. State Plans are monitored by OSHA and must be at least as effective as OSHA in protecting workers and in preventing work-related injuries, illnesses and deaths. It is an employer's responsibility to check with their state for applicable requirements. Visit [www.osha.gov/stateplans](http://www.osha.gov/stateplans) for more information.



Implementing a workplace safety program provides many benefits to your business.

- It may help prevent workplace injuries and illnesses, which can lead to a reduction in your workers' compensation premium.
- It may help improve compliance with laws and regulations
- It may help engage workers and increase productivity

# Getting started

Here are steps to follow to get started on developing your workplace safety program:

1. A **Workplace Safety Program** template follows this Reference Guide to customize for your business.
2. Save this file as an Adobe PDF or export to a Microsoft Word document if you don't have access to Adobe.
3. Customize the cover page of the program by adding your company name and program implementation date. Alternatively, you may use your company letterhead for the cover page.
4. Carefully review all sections of the sample program to understand your responsibilities and determine which changes or modifications (if any) are necessary to better accommodate your workplace. (For example, if your safety committee meets monthly instead of quarterly, then Section 2 of the program should be changed to reflect your practices.)
5. Add safety rules, policies or procedures appropriate to your work environment that are not listed in the template. Edit any rules or policies that are specific to your company.
6. Visit our website at [summitholdings.com](https://summitholdings.com). Go to the **Safety** tab and select **Workplace Safety Programs**. You will find industry-specific safety rules, policies and procedures. You may download the document(s) that apply to your business and add them to your workplace safety programs document.
7. Once your safety program is complete, save the file. You can save it as an Adobe PDF to share with employees electronically. You must ensure all employees review and understand the program, and receive training. All employees should be provided access to your written safety program and know how to request a copy of the program.
8. For OSHA compliance, we recommend that you have your own attorney review your safety program.

**Tip:**  
If exporting  
this PDF to Word,  
make sure to adjust  
the formatting if  
necessary.

# Instructions by section

Carefully review all sections of the sample program to understand your employer responsibilities and determine which changes or modifications (if any) are necessary to better accommodate your workplace. **Click on a blue section title below to go directly to the corresponding section in the workplace safety program.**

## Section 1: Management commitment and involvement

This includes your policy statement which expresses management's commitment to safety in the workplace. Please include the name, title and contact information of your safety coordinator and the signature of the CEO or president of your company.

## Section 2: Safety committee

Include the names of the individuals who will serve on your safety committee. There is no requirement for the number of employees on your committee; however, it must be an equal representation of supervisory and nonsupervisory personnel. In a small company, a safety coordinator can be appointed as the responsible party.

A **Safety Committee Meeting Minutes** template is provided on page 7 of this guide. You may make copies of this form and use it to record the minutes of your meetings. It also can be used as a subject outline for your committee meetings.

## Section 3: Safety and health training

Please be specific regarding your safety training procedures and requirements for new and current employees. See 29C.F.R. § 1926.21(b)(1) [2022] ["The employer should avail himself of the safety and health training programs the [U.S.] Secretary [of Labor] provides."]. A **Safety Training Documentation** form is provided on page 8 of this guide.

## Section 4: Safety inspections and maintenance

Safety inspections identify areas of risk, including chemical hazards. See 29 C.F.R. § 1910.1200(b)(1) [2022] ["OSHA recommends general workplace inspections, but certain inspections are required. Be sure to check the standards to know what you must do in your facility. This section requires chemical manufacturers or importers to classify the hazards of chemicals which they produce or import, and all employers to provide information to their employees about the hazardous chemicals to which they are exposed, by means of a hazard communication program, labels and other forms of warning, safety data sheets, and information and training. . . ."].

Management should make periodic inspections, announced and unannounced. Inspection checklists should include the date, time, facility and inspector completing the safety inspection. Your checklist should include satisfactory, unsatisfactory and not applicable columns for each item on the list.

Self-inspection checklists are available on the OSHA website at [www.osha.gov](http://www.osha.gov). They also may be supplied by vendors or can be developed by your company. An **Inspection Checklist** form is provided on page 9 of this guide.

Preventive maintenance is a schedule of planned inspections to help prevent breakdowns and equipment failures before they happen. Your safety program should include a written emergency action plan and a fire prevention plan. Without a preventive maintenance program, you may lose productivity and costs may escalate. Make sure you include OSHA requirements that apply to your business.

## Section 5: First-aid procedures

Include the contact information needed in case of an emergency situation, including 911. The employer is required to make first aid supplies readily available, and suitable facilities for quick eye flushing, where employees may be exposed to injurious corrosive materials. See 29 C.F.R. § 1910.151 [2022]; see also 29 C.F.R. § 1926.50 for

construction workers. See also 29 C.F.R. § 1926.50(d)(1)-(2) [2022] [{"(1) First-aid supplies shall be easily accessible when required. (2) The contents of the first-aid kit shall be placed in a weatherproof container with individual sealed packages for each type of item, and shall be checked by the employer before being sent out on each job and at least weekly on each job to ensure that the expended items are replaced."}]; 29 C.F.R. §§ 1926.23 & 1926.50, App. A [2022]; and <https://www.osha.gov/sites/default/files/publications/OSHA3317first-aid.pdf>.

## Section 6: Incident investigation

See 29 C.F.R. § 1960.29(d) [2022] ["The investigative report of the accident shall include appropriate documentation on date, time, location, description of operations, description of accident, photographs, interviews of employees and witnesses, measurements and other pertinent information. A copy of the investigative report required by this section shall be forwarded to the official in charge of the workplace, the appropriate safety and health committee, and the exclusive employee representative, if any. The investigative report shall be made available to the Secretary or his authorized representative on request."].

You can report to OSHA by:

1. Calling OSHA's free and confidential number at 1-800-321-OSHA [6742].
2. Online forms can be found at [www.osha.gov](http://www.osha.gov)

Under OSHA's record-keeping regulations, all employers must report:

1. All work-related fatalities within 8 hours.
2. All work-related inpatient hospitalizations, all amputations and all losses of an eye within 24 hours.

See 29 C.F.R. §§ 1904, et seq., 1904.1(a), 1904.4 [recording criteria], 1904.7, 1904.39 [2022]. Other than the above, "[i]f your company had 10 or fewer employees at all times during the last calendar year, you do not need to keep OSHA injury and illness records" unless OSHA or the Bureau of Labor informs you in writing to do so. See § 1904.1(a).

Click [here](#) to access our Incident Investigation forms or visit our website at [summitholdings.com](http://summitholdings.com) and go to the **Safety** tab and select **Incident Investigation**.

## Section 7: Record-keeping procedures

The safety coordinator will control and maintain all employee incident and injury records. Records are maintained for a minimum of five years. There are partially exempt industries that may not be required to keep OSHA injury and illness records. To find out if your business is exempt, please visit <https://www.osha.gov/recordkeeping>. See also 29 C.F.R. §§ 1904.1(a) [ten or fewer employees], 1904.2(a) [specific industry group listed in Appendix], Pt. 1904, Subpt. B, App. A [2022].

Employers must post the Summary [300A] in a visible location so that all employees can be made aware of the injuries and illnesses that occurred in their workplace. If you have more than one location, you must post the Summary [300A] at each physical location. For more information, please visit <https://www.osha.gov/recordkeeping>.

See 29 C.F.R. § 1904.1 et seq. for federal requirements.

## Section 8: Safety rules, policies and procedures

This section contains workplace safety rules, policies and procedures, and should be reviewed carefully for applicability, accuracy and any necessary content additions or revisions. General workplace safety rules apply to all employees. Job-specific rules are defined by occupational class, e.g., painter, clerk, carpenter, etc.

## SAFETY COMMITTEE MEETING MINUTES

Date of committee meeting

Time

Minutes prepared by

Location

Names of members in attendance

Previous action items

Review of incidents since previous minutes

### Recommendations

For prevention

From employees

From incident investigation reports

To update the safety program

For safety training

Comments

# SAFETY TRAINING DOCUMENTATION

Employee name

Date

Supervisor

Trainer

## Rules and regulations reviewed (check items reviewed below)

☐ General review of safety rules for all employees

☐ Sanitation/Health

☐ Specific safety procedures for employee's position

☐ General maintenance

☐ First aid

☐ Lifting procedures

☐ Office safety

☐ Furniture use

☐ Equipment use

☐ Climbing a step ladder

Comments

Date reviewed

## Rules and regulations marked above have been reviewed with employee.

Supervisor name (printed)

Supervisor signature

**I have been advised of all safety and health regulations and will adhere to them to the best of my ability.**

Employee name (printed)

Employee signature

# INSPECTION CHECKLIST

Facility		Date			
Inspector		Time			
For inspection	Satisfactory	Unsatisfactory			Not applicable
			Person responsible for correction	Due date	
Doors	<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>
Walking/working surfaces	<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>
Lighting	<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>
Fire hazards	<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>
Electrical boxes	<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>
Flammable liquids	<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>
Emergency exits					
Marked properly	<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>
Unobstructed	<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>
First-aid kits, supplies	<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>
Fire extinguishers					
Accessible	<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>
Charged	<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>
Required posters	<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>
Personal training	<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>
Personal protective equipment	<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>
Flammable and combustible materials	<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>
Hand and portable powered tools	<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>
Lockout/Tag-out procedures	<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>
Confined spaces	<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>
Hazardous communications	<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>
Electrical	<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>
Building and grounds conditions	<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>
Housekeeping program	<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>
Heating and ventilation	<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>
Required OSHA recordkeeping	<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>
Safety and health programs	<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>
Specific to work environment (fill in below)					
	<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>

# Recommendations

As you work through creating your workplace safety program, here are a few recommendations to ensure your program is comprehensive.

## What you should include

A workplace safety program should include these essential elements/sections:

1. Management commitment and involvement
2. Safety committee
3. Safety and health training
4. Safety inspections and maintenance
5. First-aid procedures
6. Incident investigations
7. Record-keeping procedures
8. Safety rules, policies and procedures

Sections 1-7 are common to all employers, but you may need to modify Section 8 to reflect actual work-environment practices.

If the safety program template meets the needs of your company, it may be used exactly as written. If you have an established safety program in place, you can continue to use your program if these essential elements are covered.

## Check for compliance

We recommend that you check your state regulations and requirements for workplace safety programs before implementing it. The use of all or part of the workplace safety program manual does not relieve employers of the responsibility to comply with other applicable local, state or federal laws, such as federal record-keeping requirements. See 29 C.F.R. § 1904.1 et seq.

## Program topics to consider

Here are some safety and health program topics to consider adding to your workplace safety program depending on your industry. This list is not all inclusive of the written programs needed or required.

TOPICS FOR WRITTEN SAFETY AND HEALTH PROGRAMS	
Bloodborne pathogens and first aid	Heavy equipment safety
Confined space	Jobsite safety and field manuals
Cranes and derricks in construction	Lockout/tagout and electrical safety
Ergonomics	Overhead cranes
Fall protection	Personal protective equipment
Emergency action plan and fire safety	Powered industrial trucks and forklift safety
Hazard communications	Respiratory protection
Hearing conservation	Trenching and excavating

## ADDITIONAL WRITTEN PROGRAM TOPICS

Accident/incident investigation	Hydrogen sulfide
Asbestos awareness	Ionizing radiation
Abrasive blasting	Ladder safety
Access to medical records	Job competency
Aerial lifts	Fit for duty screening
Arc flash safety	In-Plant rail safety
Assured equipment grounding conductors	Journey management
Behavior-based safety	Lead awareness
Benzene awareness	Mobile equipment
Compressed gas safety	Record-keeping
Disciplinary policy	Rigging material handling
Driving safety	Scaffolding
Fatigue management	Silica awareness
Housekeeping and waste management	Subcontractor management plans
Hazardous waste operations and emergency response	Stop work authority
Hexavalent chromium [Chromium VI]	Short service employee
Welding, cutting, hot work	

### Resources available

We recommend consulting the OSHA website for additional information on key program elements, such as state standards, industry standards and employee training.

Our loss prevention consultants can work with you to evaluate potential hazards and identify plans to correct safety concerns in your workplace. Contact your Summit loss prevention consultant by calling 1-800-282-7648.

## Frequently asked questions

### Q: Where do I find the Workplace Safety Program template?

A: A workplace safety program template for you to customize for your business follows this reference guide and is located on the Summit website at [summitholdings.com](https://summitholdings.com). Go to the **Safety** tab and click on **Workplace Safety Programs**.

### Q: Who should I share my workplace safety program with?

A: Your completed workplace safety program should be reviewed with and made available to all employees.

### Q: Do I need to replace my current workplace safety program?

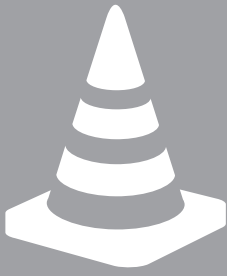
A: No, you do not. If your current program follows protocols, you can just take different elements from the template we provide and revise your program as needed.



**Summit website: [summitholdings.com](https://summitholdings.com)**

**OSHA website: [www.osha.gov](https://www.osha.gov)**

The information presented in this publication is intended to provide guidance and is not intended as a legal interpretation of any federal, state, or local laws, rules, or regulations applicable to your business. Summit does not warrant that this document complies with all aspects of OSHA. Please have your attorney review your final Program for OSHA compliance. The loss prevention information provided is intended only to assist policyholders of Summit managed insurers in the management of potential loss producing conditions involving their premises and/or operations based on generally accepted safe practices. In providing such information, Summit Consulting LLC does not warrant that all potential hazards or conditions have been evaluated or can be controlled. It is not intended as an offer to write insurance for such conditions or exposures. The liability of Summit Consulting LLC and its managed insurers is limited to the terms, limits, conditions, and exclusions of the insurance policies underwritten by any of them.



---

# Workplace Safety Program

---



Company name: \_\_\_\_\_

Program implementation date: \_\_\_\_\_

---

This sample workplace safety program was created to assist employers with the development of their own program and compliance.

---

# Table of contents

*Click on a blue section title below to go directly to the corresponding section in the program.*

## **Section 1: Management commitment and involvement**

Policy statement .....	3
------------------------	---

## **Section 2: Safety committee**

Members .....	4
Responsibilities .....	4
Meetings .....	4

## **Section 3: Safety and health training**

Job-specific training .....	5
Periodic retraining .....	5
Additional resources .....	6
Safety training documentation form .....	7

## **Section 4: Safety inspections and maintenance**

Safety inspections .....	8
Preventive maintenance .....	8

## **Section 5: First-aid procedures**

Emergency contact information .....	9
Minor first-aid treatment .....	9
Nonemergency medical treatment .....	9
Emergency medical treatment .....	10
First-aid training .....	10
First-aid instructions .....	10

## **Section 6: Incident investigation**

Procedures .....	12
------------------	----

## **Section 7: Record-keeping procedures**

Record maintenance .....	13
Annual summary of injuries and illnesses .....	13

## **Section 8: Safety rules, policies and procedures**

All employees	
Housekeeping .....	14
General lifting procedures .....	14
Ladders and step ladders .....	15
Fueling vehicles safely .....	16
Driving rules .....	16
Office personnel	
General office safety .....	16
Furniture use .....	17
Equipment use .....	17

# Section 1: Management commitment and involvement

## Policy statement

The management of this organization is committed to providing a safe and productive work environment and to fostering the well-being and health of its employees. It is the policy of this organization that employees report unsafe conditions and work-related injuries, and do not perform work tasks if the work is considered unsafe. Employees must report all incidents, injuries and unsafe conditions to their supervisors. Such reports will not result in retaliation, discrimination, penalty or other disincentive.

Employee recommendations to improve safety and health conditions will be given thorough consideration by our management team. Management will give top priority to and provide the financial resources for the correction of unsafe conditions. Similarly, management will take disciplinary action against any employee who willfully or repeatedly violates workplace safety rules. This action may include verbal or written reprimands and may ultimately result in termination of employment.

The primary responsibility for the coordination, implementation and maintenance of our workplace safety program has been assigned to:

Name:	
Title:	Phone:

Senior management will be actively involved with employees in establishing and maintaining an effective safety program. Our safety program coordinator, members of our management team or I will participate with you or your department's employee representative in ongoing safety and health program activities, which include:

- Promoting safety committee participation.
- Providing safety and health education and training.
- Reviewing and updating workplace safety rules.

This policy statement serves to express management's commitment to and involvement in providing our employees a safe workplace. This workplace safety program will be incorporated as the standard of practice for this organization. Compliance with the safety rules will be required of all employees as a condition of employment.

Signature of CEO/President:	Date:
-----------------------------	-------

## Section 2: Safety committee

### Members

A safety coordinator and/or a safety committee has been established to recommend improvements to our workplace safety program and to identify corrective measures needed to eliminate or control recognized safety and health hazards. The safety committee consists of an equal representation of supervisory and nonsupervisory members of our organization.

Safety program coordinator:	Nonsupervisory employee member:
Supervisory employee member:	Nonsupervisory employee member:
Supervisory employee member:	Nonsupervisory employee member:

### Responsibilities

The safety committee shall determine the schedule for evaluating the effectiveness of control measures used to protect employees from safety and health hazards in the workplace.

The safety committee will be responsible for assisting management in reviewing and updating workplace safety rules based on incident investigation findings, any inspection findings and employee reports of unsafe conditions or work practices, in addition to accepting and addressing anonymous complaints and suggestions from employees.

The safety committee will also be responsible for assisting management in updating the workplace safety program by evaluating employee injury and incident records, identifying trends and patterns, and formulating corrective measures to prevent recurrence.

The safety committee will be responsible for assisting management in evaluating employee incident and illness prevention programs, and promoting safety and health awareness and co-worker participation through continuous improvements to the workplace safety program.

Safety committee members will participate in safety training and will be responsible for assisting management in monitoring workplace safety education and training to ensure that it is in place, that it is effective, and that it is documented.

*In a very small company, a safety coordinator can be appointed as the responsible party to satisfy the committee requirements for the Workplace Safety Program.*

### Meetings

Safety committee meetings are held quarterly or more often, if needed. The safety program coordinator will post the minutes of each meeting within one week of each meeting.

## Section 3: Safety and health training

Workplace safety and health orientation begins on the first day of initial employment or job transfer. Each employee has access to a copy of this safety program, through his or her supervisor, for review and future reference. Each employee will be given a personal copy of the safety rules, policies and procedures pertaining to their job. Supervisors will ask questions of employees and answer any employee questions to ensure knowledge and understanding of safety rules, policies and job-specific procedures described in our workplace safety program manual.

All employees will be instructed by their supervisors that compliance with the safety rules described in the workplace safety manual is required. *All training will be documented, and records maintained.*

*You will be provided with a **Safety Training Documentation** form to review and complete after your training (sample provided on page 7).*

### Job-specific training

- Supervisors will initially train employees on how to perform assigned job tasks safely.
- Supervisors will carefully review with each employee the specific safety rules, policies and procedures that are applicable and that are described in the workplace safety manual.
- Supervisors will give employees verbal instructions and specific directions on how to perform the work safely.
- Supervisors will observe employees performing the work. If necessary, the supervisor will provide a demonstration using safe work practices or remedial instruction to correct training deficiencies before an employee is permitted to perform the work without supervision.
- All employees will receive safe-operating instructions on seldom used or new equipment before using the equipment.
- Supervisors will review safe work practices with employees before permitting the performance of new, non-routine or specialized procedures.

### Periodic retraining

All employees will be retrained periodically on safety rules, policies and procedures, and when changes are made to the workplace safety manual.

Individual employees will be retrained after a work-related injury caused by an unsafe act or work practice, and/or when a supervisor observes employees displaying unsafe acts, practices or behaviors.

## **Additional resources**

Safety training refers to learning programs designed to train employees on precautionary processes and procedures to reduce the chance of injury or fatality on the job. Safety training is a form of compliance training designed to protect our business and workers.

Recommended practices are used as a proactive approach to managing workplace safety and health. Additional policies, procedures and training on the following topics will be provided.

### **Emergency action plan**

Procedures and training for reporting a fire or other emergency. Includes emergency evacuation procedures, including the types of evacuation and exit route assignments.

### **Ergonomics**

Procedures and training for a systematic process to identify, analyze and control workplace risk factors, often for reducing musculoskeletal disorders.

### **Fire prevention plan**

Procedures and training for proper handling of major fire hazards, handling and storage of hazardous materials, potential ignition sources and their control, and the type of fire protection equipment necessary to control each hazard.

### **Violence in the workplace**

Policy and procedures to explain that all claims of workplace violence will be investigated and remedied promptly. Workplace violence is any act or threat of physical violence, harassment, intimidation or other threatening disruptive behavior that occurs at the work site. It can range from threats and verbal abuse to physical assaults and even homicide.

Individual employees will be retrained after a work-related injury caused by an unsafe act or work practice, and/or when a supervisor observes employees displaying unsafe acts, practices or behaviors.

## SAFETY TRAINING DOCUMENTATION

Employee name		Date
Supervisor		Trainer
Rules and regulations reviewed (check items reviewed below)		
<input type="checkbox"/> General review of safety rules for all employees	<input type="checkbox"/> Sanitation/Health	
<input type="checkbox"/> Specific safety procedures for employee's position	<input type="checkbox"/> General maintenance	
<input type="checkbox"/> First aid	<input type="checkbox"/> Lifting procedures	
<input type="checkbox"/> Office safety	<input type="checkbox"/> Furniture use	
<input type="checkbox"/> Equipment use	<input type="checkbox"/> Climbing a step ladder	
Comments  <h1>SAMPLE</h1>		
Date reviewed		
Rules and regulations marked above have been reviewed with employee.		
Supervisor name (printed)		Supervisor signature
I have been advised of all safety and health regulations and will adhere to them to the best of my ability.		
Employee name (printed)		Employee signature

## Section 4: Safety inspections and maintenance

### Safety inspections

It is the responsibility of all employees and the employer to maintain safe working conditions.

Checklists for safety inspections ensure that important items are not overlooked. Inspections identify areas of risk. This includes chemical hazards.<sup>1</sup>

Safety directors/supervisors should continually monitor work areas, and scheduled inspections should be documented and completed on a regular basis. Written reports of these inspections should be kept on file.

Management can make periodic inspections, announced and unannounced.

Self-inspection checklists are available on the OSHA website at [www.osha.gov](http://www.osha.gov).

### Preventive maintenance

Preventive maintenance is a schedule of planned inspections to help prevent breakdowns and equipment failures before they happen. Inspections should be performed at regularly scheduled times.

Preventive maintenance programs can help avoid most equipment failures. Regular equipment maintenance should be provided to prevent breakdowns that can create hazards.

Preventive and regular maintenance should be documented and tracked to completion. During preventive maintenance, workers can document damage or wearing of parts or equipment to repair or replace parts before they cause a failure or injuries. Without a preventive maintenance program, you may lose productivity and costs may escalate.

Preventive maintenance is a schedule of planned inspections to help prevent breakdowns and equipment failures before they happen. Inspections should be performed at regularly scheduled times.

Preventive maintenance programs can help avoid most equipment failures. Regular equipment maintenance should be provided to prevent breakdowns that can create hazards. Preventive and regular maintenance should be documented and tracked to completion. During preventive maintenance, workers can document damage or wearing of parts or equipment to repair or replace parts before they cause a failure or injuries.

<sup>1</sup>See 29 C.F.R. § 1910.1200(b)(1) [2022] (“This section requires chemical manufacturers or importers to classify the hazards of chemicals which they produce or import, and all employers to provide information to their employees about the hazardous chemicals to which they are exposed, by means of a hazard communication program, labels and other forms of warning, safety data sheets, and information and training. . . .”)

## Section 5: First-aid procedures

### Emergency contact information

Safety coordinator:	Poison control:
First-aid response:	Fire department:
Medical clinic:	Police department:
Clinic address:	Ambulance:

The employer is required to make first aid supplies readily available, and suitable facilities for quick eye flushing, where employees may be exposed to injurious corrosive materials.<sup>2</sup>

### Minor first-aid treatment

Service vehicle first-aid kit location:

If you sustain an injury or are involved in an incident requiring minor first-aid treatment:

- Inform your supervisor.
- Administer or have someone administer first-aid treatment to the injury or wound.
- If a first-aid kit is used, indicate usage on an incident investigation report.
- Provide details for the completion of an incident investigation report.
- Note that use of a first-aid kit is not intended to be a substitute for medical attention.

### Nonemergency medical treatment

For nonemergency work-related injuries requiring professional medical assistance, management must first authorize treatment. If you sustain an injury requiring treatment other than first aid:

- Inform your supervisor.
- Proceed to the medical facility posted above. Your supervisor will assist with transportation, if necessary.
- Provide details for the completion of an incident investigation report.

<sup>2</sup> See 29 C.F.R. § 1910.151 [2022]; see also 29 C.F.R. § 1926.50 for construction workers.

## Emergency medical treatment

If you sustain a severe injury requiring emergency treatment:

- Call for help and seek assistance.
- Use the emergency telephone numbers and/or call 911. Administer first-aid treatment to the injury or wound until emergency personnel arrives.
- Provide details for the completion of an incident investigation report.

## First-aid training

Each employee will receive training and instructions from his or her supervisor regarding our first-aid procedures.

## First-aid instructions

In all cases requiring emergency medical treatment, immediately call 911 or have a coworker call to request emergency medical assistance. Be sure to use required blood-borne pathogen procedures while administering first aid.

### Wounds

**Minor:** *Cuts, lacerations, abrasions or punctures*

- Wash the wound using soap and water; rinse it well.
- Cover the wound using a clean dressing.

**Major:** *Large, deep and bleeding wounds*

- Stop the bleeding by pressing directly on the wound, using a bandage or cloth.
- Keep pressure on the wound until medical help arrives.

### Broken bones

- Do not move the victim unless it is absolutely necessary.
- If the victim must be moved, splint the injured area. Use a board, cardboard or rolled newspaper as a splint.

## **Burns**

### **Thermal (heat)**

- Rinse the burned area without scrubbing it and immerse it in cold water. Do not use ice water.
- Blot dry the area and cover it using sterile gauze or a clean cloth.

### **Chemical**

- Immediately flush the exposed area with cool water for 15 to 20 minutes.

## **Eye injury**

### **Small particles**

- Do not rub your eyes.
- Use the corner of a soft, clean cloth to draw particles out, or hold the eyelids open and flush the eyes continuously with water.

### **Large or stuck particles**

- If a particle is stuck in the eye, do not attempt to remove it.
- Cover both eyes with a bandage.

### **Chemical**

- Immediately irrigate the eyes and under the eyelids with water for 30 minutes.

## Section 6: Incident investigation

### Procedures<sup>3,4</sup>

An incident investigation will be performed by a supervisor at the location where the incident occurred. The safety coordinator is responsible for ensuring that an incident investigation report is filled out completely and that any recommendations are addressed. Supervisors will investigate all incidents, injuries and occupational diseases using the following investigation procedures:

- Implement temporary control measures to prevent any additional employee injuries.
- Review the equipment, operations and processes to gain an understanding of the incident situation.
- Identify and interview each witness and any other person who might provide clues to the incident's cause(s).
- Investigate causal conditions and unsafe acts; make conclusions based on existing facts.
- Complete the incident investigation report.
- Provide recommendations for corrective actions.
- Indicate the need for additional or remedial safety training.

Incident investigation reports should be submitted to the safety coordinator as soon as possible after the incident.

<sup>3</sup> See 29 C.F.R. § 1960.29[d] [2022] ["The investigative report of the accident shall include appropriate documentation on date, time, location, description of operations, description of accident, photographs, interviews of employees and witnesses, measurements and other pertinent information. A copy of the investigative report required by this section shall be forwarded to the official in charge of the workplace, the appropriate safety and health committee, and the exclusive employee representative, if any. The investigative report shall be made available to the Secretary or his authorized representative on request."].

<sup>4</sup> See 29 C.F.R. §§ 1904, et seq., 1904.1[a], 1904.4 [recording criteria], 1904.7, 1904.39 [2022]. Other than the above, "[i]f your company had 10 or fewer employees at all times during the last calendar year, you do not need to keep OSHA injury and illness records" unless OSHA or the Bureau of Labor informs you in writing to do so. See § 1904.1[a].

## Section 7: Record-keeping procedures

### Record maintenance

The safety coordinator will control and maintain all employee incident and injury records. Records are maintained for a minimum of five years and include:

- Incident Investigation Reports
- Workers' Compensation First Report of Injury or Illness
- Log and Summary of Occupational Injuries and Illnesses as required by OSHA's Record-keeping Regulation, 29 CFR 1904.2:
  - OSHA Form 300: Log of Work-Related Injuries and Illnesses
  - OSHA Form 300A: Summary of Work-Related Injuries and Illnesses
  - OSHA Form 301: Injury and Illness Incident Report

### Annual summary of injuries and illnesses

Employers must complete and post OSHA's Form 300A to record any workplace injuries or illnesses that occurred during the year. It must be posted in a visible location for all employees to view.

## Section 8: Safety rules, policies and procedures

These safety rules have been prepared to protect you in your daily work. Employees must follow these rules, review them often and use good common sense in carrying out assigned duties.

These safety rules shall include both general workplace safety rules and job-specific safety rules.

General workplace safety rules apply to all employees. Job-specific rules are defined by occupational class, e.g., painter, clerk, carpenter, etc.

General and job-specific safety rules are to be determined based on the needs and exposures of our company. The following pages represent some common examples.

### All employees

#### Housekeeping

- Use caution signs/cones to designate slippery areas.
- Do not store or leave items on stairways.
- Return tools to their proper storage places after using them.
- Do not block or obstruct stairwells, exits or accesses to safety and emergency equipment, such as fire extinguishers or fire alarms.
- Do not place materials, such as boxes or trash in walkways and passageways.
- Do not use gasoline for cleaning purposes.
- Mop up water around water fountains, drink machines and ice machines.

#### General lifting procedures

- Test the weight of the load before lifting by pushing the load along its resting surface.
- If the load is too heavy or bulky, use lifting and carrying aids such as hand trucks, dollies, pallet jacks and carts, or get assistance from a coworker.
- Never lift anything if your hands are greasy or wet.
- Wear protective gloves when lifting objects with sharp corners or jagged edges.
- When lifting:
  - Face the load.
  - Position your feet 6 inches to 12 inches apart with one foot slightly in front of the other.

- Bend at the knees, not at the back.
- Keep your back straight.
- Get a firm grip on the object using your hands and fingers. Use handles when available.
- Hold the object as close to your body as possible.
- Lift smoothly and gradually; do not jerk the load.
- If you must change direction while lifting or carrying the load, pivot your feet and turn your entire body. Do not twist at the waist.
- Set down the object in the same manner as you picked it up, except in reverse.
- Do not lift an object from the floor to a level above your waist in one motion. Set the load down on a table or bench and then adjust your grip before lifting it higher.

### **Ladders and stepladders<sup>5</sup>**

- Read and follow the manufacturer's instruction label affixed to the ladder if you are unsure how to use the ladder.
- Do not use ladders that have loose rungs, cracked or split side rails, missing rubber foot pads or other visible damage.
- Keep ladder rungs clean and free of grease. Remove buildup of material, such as dirt or mud.
- When performing work from a ladder, face the ladder and do not lean backward or sideways from the ladder.
- Allow only one person on the ladder at a time.
- Do not stand on the top two rungs of any ladder.
- Do not stand on a ladder that wobbles or leans to the left or right of center or is crooked.
- Do not try to "walk" a ladder by rocking it. Climb down the ladder and then move it.
- Climbing a ladder:
  - Face the ladder when climbing up or down it.
  - Do not carry items in your hands while climbing up or down a ladder.
  - Maintain a three-point contact by keeping both hands and one foot or both feet and one hand on the ladder at all times when climbing up or down.

<sup>5</sup> See 29 C.F.R. § 1910.23 [2022] [Ladders] for further information concerning ladder use safety.

## **Fueling vehicles safely**

- Turn the vehicle off before fueling.
- Do not smoke while fueling a vehicle.
- Wash hands with soap and water if you spill gasoline on them.

## **Driving rules**

- Shut all doors and fasten your seat belt before moving the vehicle.
- Obey traffic patterns and signs at all times.
- Maintain a three-point contact using both hands and one foot or both feet and one hand when climbing into and out of vehicles.
- Do not leave keys in an unattended vehicle.
- Avoid cell phone use while driving.
- Do not text and drive.

## **Office personnel**

### **General office safety**

- Do not place objects such as boxes or trash in walkways and passageways.
- Do not throw matches, cigarettes or other smoking materials into trash baskets.
- Do not kick objects out of your pathway; pick them up or push them out of the way.
- Keep floors clear of items such as paper clips, pencils, tacks or staples.
- Remove rugs and mats that do not lie flat on the floor.
- Mop up water around water fountains and drink machines.
- Do not block your view by carrying large or bulky items; use a dolly or hand truck or get assistance from a fellow employee.
- Store sharp objects, such as pens, pencils, letter openers or scissors, in drawers or with the points down in a container.
- Carry pencils, scissors and other sharp objects with the tips pointing down.
- Use a ladder or step stool to retrieve or store items that are located above your head.
- Do not run on stairs or take more than one step at a time.

- Keep doors in hallways fully opened or fully closed.
- Use handrails when ascending or descending stairs or ramps.
- Obey all posted safety and danger signs.

### **Furniture use**

- Open only one file cabinet drawer at a time. Close the filing cabinet drawer you were working in before opening another filing drawer in the same cabinet.
- Use the handle when closing doors and drawers.
- Put heavy files in the bottom drawers of file cabinets.
- Do not tilt your chair on its back two legs while you are sitting in it.
- Do not stand on furniture to reach high places.

### **Equipment use**

- Do not use fans that have excessive vibration, frayed cords or missing guards.
- Do not place floor fans in walkways, aisles or doorways.
- Do not plug multiple electrical cords into a single outlet.
- Do not use extension or power cords that have the ground prong removed or broken off.
- Do not use frayed, cut or cracked electrical cords.
- Keep all working spaces, doorways and walkways clear of cords to avoid creating a hazard to employees.<sup>6</sup>

<sup>6</sup> See 1926.416[b][2] General requirements.



The information presented in this publication is intended to provide guidance and is not intended as a legal interpretation of any federal, state or local laws, rules or regulations applicable to your business. Summit does not warrant that this document complies with all aspects of OSHA. Please have your attorney review your final program for OSHA compliance. The loss prevention information provided is intended only to assist policyholders of Summit managed insurers in the management of potential loss producing conditions involving their premises and/or operations based on generally accepted safe practices. In providing such information, Summit Consulting LLC does not warrant that all potential hazards or conditions have been evaluated or can be controlled. It is not intended as an offer to write insurance for such conditions or exposures. The liability of Summit Consulting LLC and its managed insurers is limited to the terms, limits, conditions and exclusions of the insurance policies underwritten by any of them.