

The accident prevention plan

BACK TO THE BASICS

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It is a common practice for most companies to reevaluate and update company safety programs on an annual basis. With the safety and health of employees a main priority for employers, it is interesting that a number of companies do not have an accident prevention plan, which is a key element in any safety and health program. From the Federal Occupational Safety and Health Administration (OSHA) to state jurisdictions, safety and health programs are an integral part of program monitoring and enforcement. Failure to have a written plan to support those programs is one of the quickest ways to receive a citation.

The written plan gives employers a framework for understanding safety issues within their work environment, assists in preventing occupational injuries and facilitates safety training. These elements work together to create a safe work environment, build employee confidence and minimize operational costs.

In developing a safety program, the employer needs to assess the worksite, review for known hazards and anticipate potential unknown hazards. It is important that each employer customize their safety program, bringing all parties to the table—from top level management to members of the workforce. Failure to include all groups may result in an incomplete program, which then results in an incomplete plan.

The basic plan includes:

- :: Program orientation
- :: How to report injuries
- :: How to report unsafe conditions
- :: What to do in an emergency
- :: Hazard identification
- :: Use of personal protective equipment
- :: On-the-job training.

Additional program elements must include a safety committee or employee safety meetings.

Watch for the pitfalls of either being too general or too specific. It is insufficient to use general terms like "be careful" when a specific procedure must be used in order to work safely. However, the written plan should not be so detailed with specific steps that it removes an employee's responsibility to use good judgment.

Employers must train each and every employee on the current safety procedures relevant to their position. Training should be detailed, use concrete examples and be as hands-on as possible. If the program changes, new training is required and should be documented in writing.

Employers should establish a review process of the program and written plan so that they are confident that employees are following correct safety procedures. At a minimum, the review should include the following:

- :: Annual audits
- :: A review of audit findings
- :: Proof of implementation of audit findings
- :: Accident investigations.

The plan should be reviewed at least annually to determine if it is accurately reflecting current safety needs.

The annual audit will look very similar to the development of the initial plan, only on a smaller scale. The audit should include a review of safety measures and goals that were established in the initial plan, and involve all levels of employees. Once this audit is completed, it is necessary that employers review and adequately implement the findings.

Even with the best plan in place, accidents will occur and should be fully investigated by the employer. The investigation team should include both management and members of the company's workforce. Investigations should include, at a minimum:

- :: Interviews
- :: Site visits
- :: Review of existing plan
- :: Review of existing protective and safety equipment
- :: Review of manufacturers' recommended uses and operation manuals.

In situations where there is a mandatory inspection by an enforcement agency, such as in a fatality investigation, it is important that the employer contact legal counsel early in the process. Legal counsel can assist an employer in determining their plan of action and help minimize potential liability.

The employer must act on what they learn from their audits and investigations, updating their safety program and written plan to reflect this new knowledge. Failure to act will unnecessarily expose employees to potential hazards and lower morale, and expose employers to potential citations and fines.

Regardless of the nature of your business, the law requires employers to have a safety program. If developed, followed and maintained, an accident prevention plan will protect the employer, the business and the employees. An investment in a formal written plan will, in the long run, save a company from unnecessary losses due to workplace injuries.



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