Still Open?

Be sure to refer to last month’s HR Answers for tips to manage your open workers comp claims before closing for the season.

Written Employee Safety Programs: Part I

Every employer is expected to provide a safe and healthful workplace. States with their own OSHA organization may require employers to implement and maintain a written Illness and Injury Prevention Program. Common citations are for violations of this safety order or one of its subsections. Further, lack of an effective written program can increase fines or other general citations. Regardless of the requirement for a written program, if you have a serious employee injury you will find that OSHA will expect to find many of these elements imbedded in your policies and procedures.

It seems to be human nature that what was a priority a couple of years ago may not be today. An annual review of your safety policies and procedures will ensure that your company is in compliance with the expectation to provide a safe workplace. Whether required or not, it is ideal for your program to be written.

Minimum requirements of a thorough written safety program are:

- Management commitment/assignment of responsibilities
- System of safety communications with employees
- System for assuring employee compliance with safe work practices
- Scheduled inspections/evaluation system
- Accident investigation
- Procedures for correcting unsafe/ unhealthy conditions
- Safety and health training and instruction
- Record-keeping and documentation.

In this issue we will explore the first 2 of these elements in more depth, and the remaining 6 in future issues.

Management Commitment/Assignment of Responsibilities

There should be a written company statement outlining your commitment to the safety and health of employees. Those with the authority and responsibility for the program should be identified by name. Issues to consider follow.

- Check your company statement. Does it still apply?
- Has a responsible person been identified? Is it still the same person?
- If you ask an employee, will he/she know who is responsible. OSHA will interview employees. Ask a few; do they give you the correct answer?

Some methods to demonstrate management’s commitment are:

- Set a workplace goal for accident prevention (for example, “Ten percent fewer injuries next year”). Communicate goals and progress to employees through safety meetings.
- Establish a system of accountability (especially for supervisors and managers).
- Allocate company resources for safety efforts (financial, material and personnel).
- Lead by example.

System of Safety Communications with Employees

Established methods to communicate to employees in a form should be readily understandable on matters relating to safety and health, including:

- Formal departmental safety training
- Regular safety meetings
- Safety committees
- Postings and written communications
- Procedures to report hazardous work conditions.

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