WHITE PAPER

Five Essential Elements of **Workplace Health and Safety**

Through informal discussions with safety professionals, one thing becomes clear:

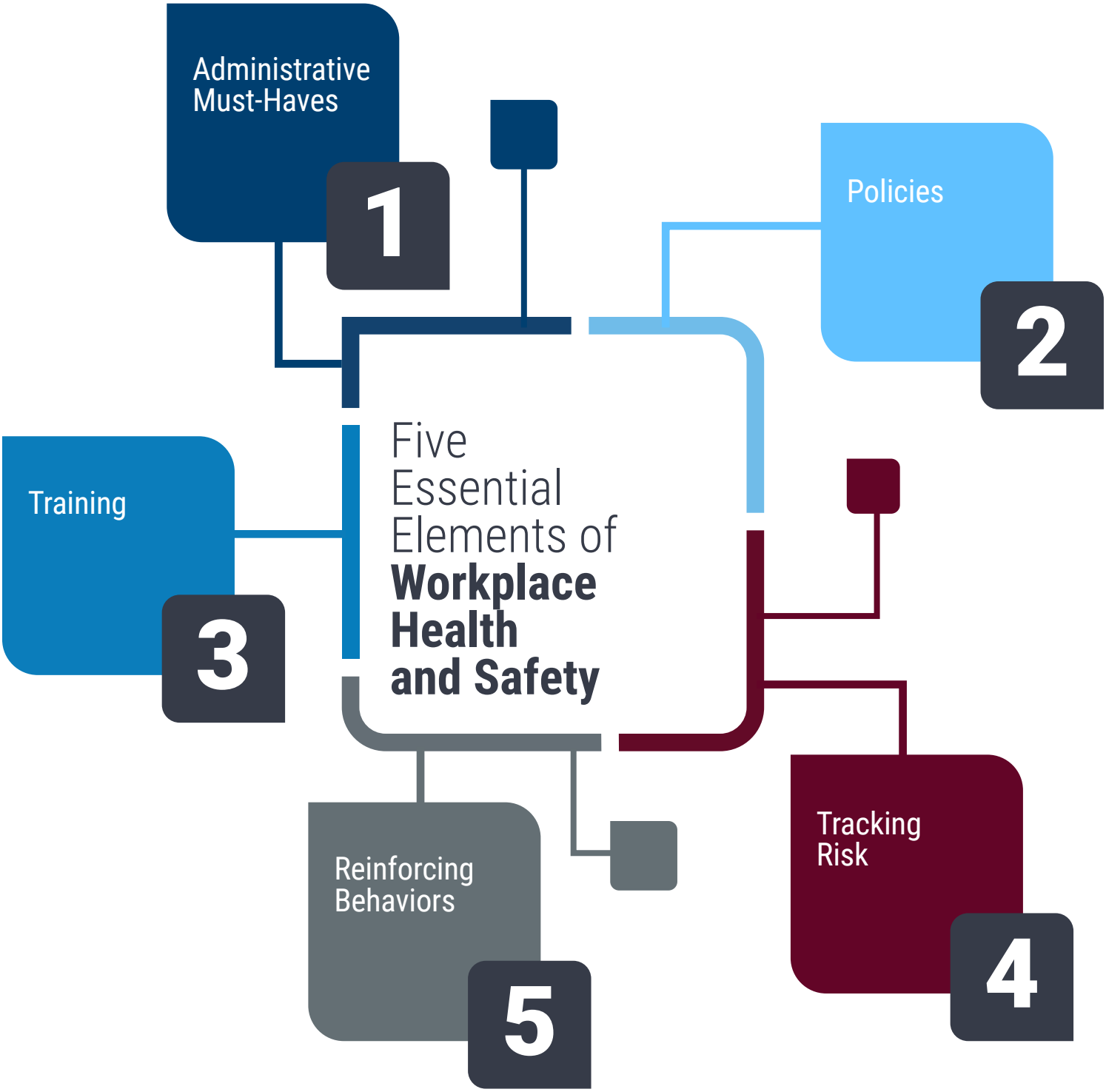
The biggest fear when it comes to workplace health and safety is that something will get missed…
and then that "something" becomes a serious compliance issue, fine, or worse: an accident.

If this is your situation—if you are finding that you are responsible for the health and safety of your people but are worried there is some key element you are missing—we have you covered. To start, you need to ensure that your system covers these five essential elements.

For many of you, what's covered here is basic, nothing you haven't heard before. While much of the material may be familiar, there is value precisely because of its emphasis on the fundamentals. You have a busy job, it is important to have core concepts that you can always lean on to gather yourself, focus your work, and simply get things done.

Why Corporate Health and Safety Programs are Needed:

- Nationally, there are approximately 2.8 workplace injuries for every 100 full-time employees.
  (Source: U.S. Bureau of Labor Statistics)
- At any time, roughly 3% of the workforce is absent (or has reduced hours) because of illness or injury.
  (Source: U.S. Bureau of Labor Statistics)
- Work-related injuries cost the U.S., employers, and individuals $171 billion annually.
  (Source: National Safety Council)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1 First Essential Element: Administrative Must-Haves

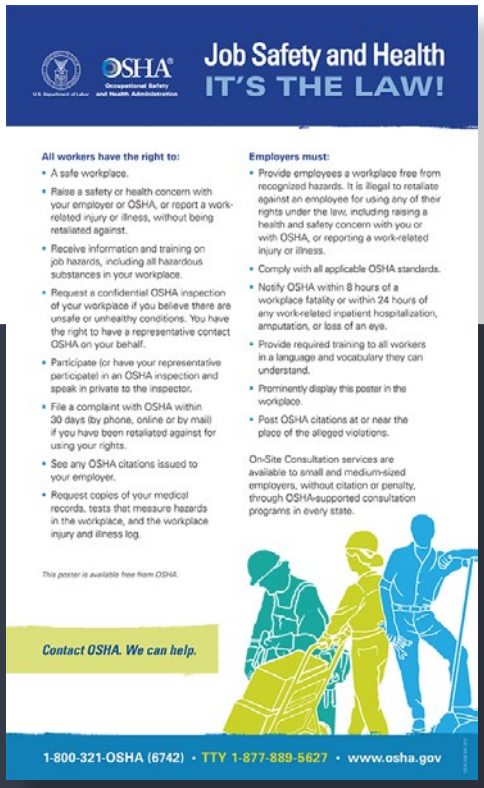
An administrative paper trail is critical for all health and safety measures, including all of the other essentials listed below. Remember: If something is not documented, you should assume that it has not been done (and so will an auditor). There are specific documentation must-haves when it comes to health and safety in the workplace, including signage, OSHA 300 log and forms, and safety data sheets (SDSs).

OSHA Signage

OSHA—the Occupational Safety and Health Administration—requires that workplaces place a poster in common areas such as break rooms. This poster informs employees of their rights under the Occupational Safety and Health Act. All covered employers are required to display the poster in their workplace.

While there are several vendors that sell such posters, you can also download a free version from OSHA, available in multiple languages. You can also order a print copy by phone. OSHA posters do not necessarily have to be updated every year.

Be sure to check, first, if your state has a specific poster. Some states have their own plans (referred to as State Plan States), and these OSHA state plans might have more stringent requirements than federal OSHA, so be sure to check with your state OSHA office.



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OSHA 300 Log

All employers are required to keep this log unless you have 10 or fewer total employees in a calendar year or you are an exempt low-hazard industry. If you are required to keep to this log, you must list recordable injuries and illnesses that happen at each address and store those records by calendar year. You can find specifics on what counts as a recordable injury or illness on the OSHA website (though we recommend purchasing a system that can help you determine recordability, too). Remember, one log is needed per physical address.

Note that, if your organization is audited by OSHA, they will likely ask for the past 3-5 years of logs. Your organization should be following best practices for document management when it comes to filing and storing these logs, including:

If something is not documented, you should assume that it has not been done (and so will an auditor).

Electronic: Keep digital (as opposed to paper versions) of documents for easy storage, transport, and protection.

Document Depository: Use a centralized storage of original documents, i.e., important documents aren't stored on an employee's computer or other potentially inaccessible location.

Document Version Control: Records of prior versions of documents should be maintained for audit/review, and to ensure employees have access to the most current version.

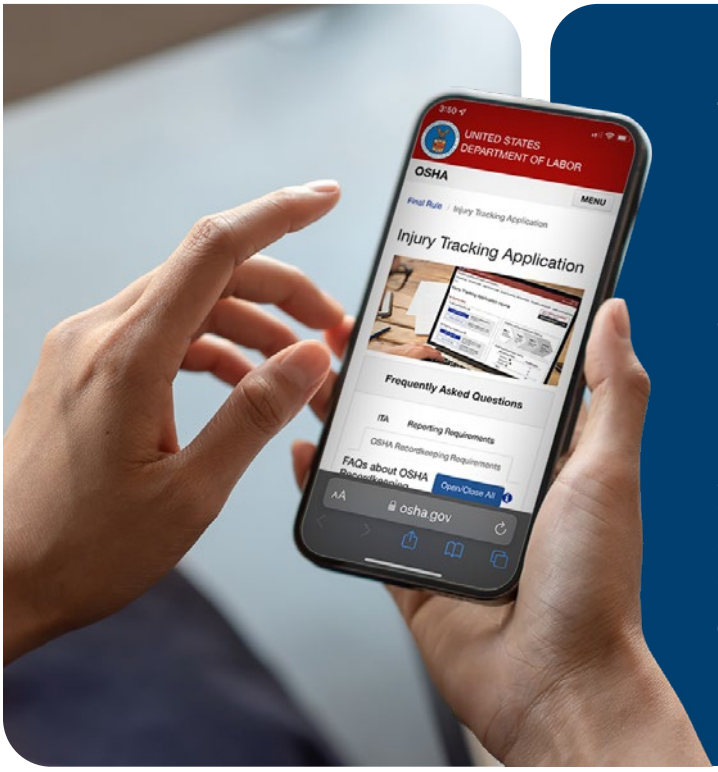
Appropriate Access: Only those who enter information on the log have access; however, you must have a procedure for OSHA auditors to access the 300 logs, if required.

Year-End 300A Form Based on Logs

At the end of the year, you will need to complete a 300A form for each log, which totals the columns for each log, and you will need to provide 1) average number of employees, 2) total hours worked that year, and 3) the NAICS (North American Industrial Classification System) code for that location.

These forms must be signed by your CEO (or highest-ranking officer) and posted from Feb. 1 through April 30 as well. Gathering the logs, totaling the hours worked and injuries recorded, getting the appropriate signatures, and meeting posting requirements are tasks that frequently require interdepartmental communication and coordination, and so they can take a fair amount of time, depending on the number of locations and complexity of your organization. For this reason, consider planning and starting the process of completed OSHA 300A forms a few months in advance.

Some organizations are required to submit the 300A form electronically by March 2 of the following year. To find out if this applies to your organization, visit the OSHA Injury Tracking Application (ITA).



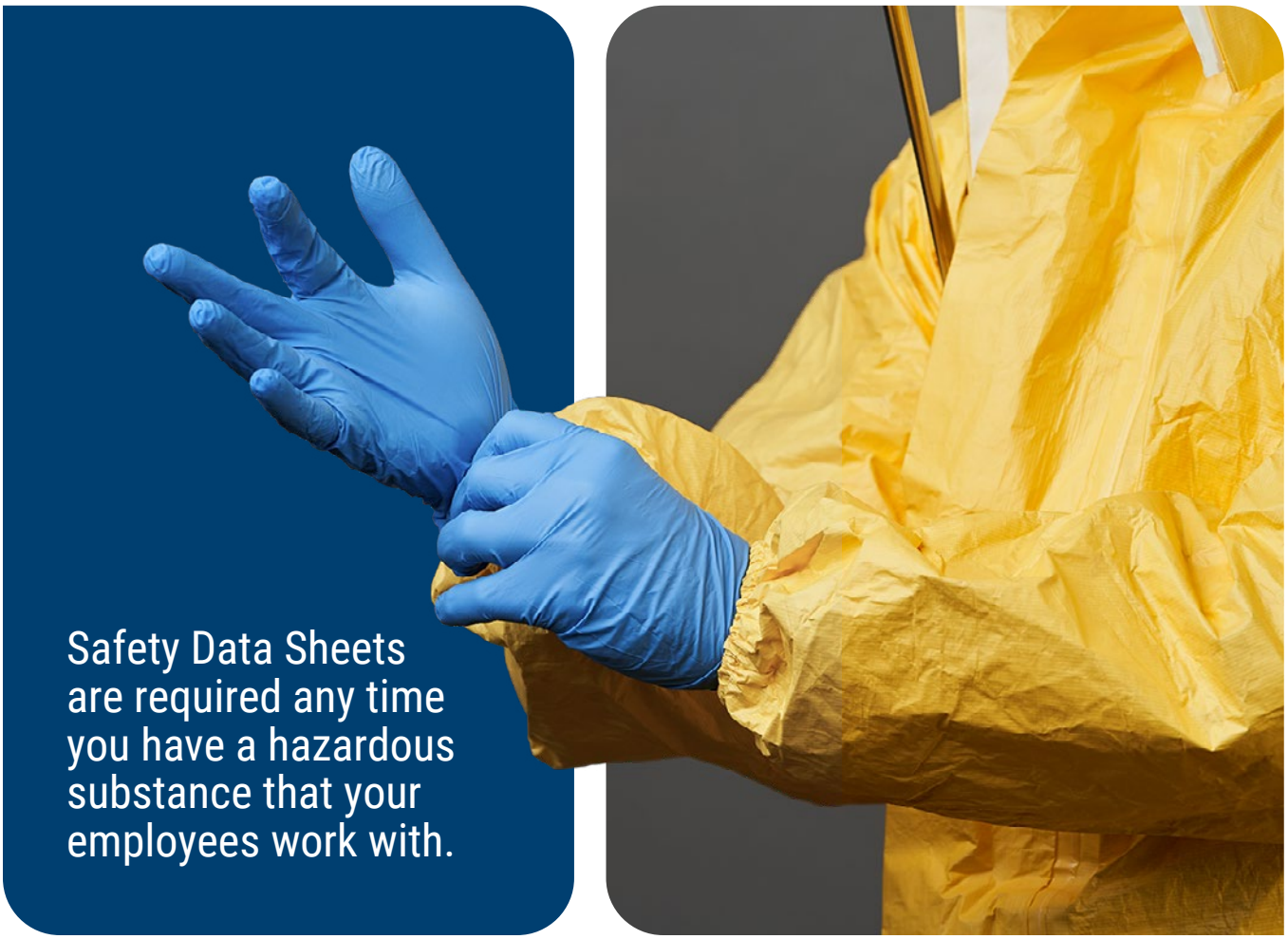
The completed and signed OSHA 300A form **must be posted and accessible to all workers** from Feb. 1st through April 30th every year.

Note: The 300A form (often referred to as the annual summary) must be accessible to current and former employees (and their representatives), typically in a read-only version.

Safety Data Sheets (SDSs)

Safety Data Sheet requirements are part of compliance with OSHA's Hazard Communication Standard (the federal law governing how organizations manage hazardous substances).

Safety Data Sheets are required any time you have a hazardous substance that your employees work with (including hazardous chemicals, vaccines, or medicines). The SDSs usually come from the manufacturer, and will have information such as the manufacturer's name, the hazardous substance's official name, storage requirements, safety and health risks, personal protective equipment needed for handling, and necessary first aid information. Whether on paper or electronic, SDSs must be easily accessible by employees. Note that organizations are required to save and archive SDSs, even for substances that are no longer in use.



2 Second Essential Element: Policies

Every organization has a policy and procedure (P&P) “binder”, whether electronic or good old-fashioned paper. It’s typically made available to all employees as a reference guide and often new hires review all P&Ps and sign an acknowledgement, and It’s also typical for organizations to ask employees to review some or all of the P&Ps on an annual basis to ensure understanding. Please note this does not meet the definition of “safety training”, which is a different essential element. Often safety training includes references to P&Ps regarding use of equipment, PPE, processes, etc. However a simple P&P review isn’t sufficient to meet training requirements.

Some companies refer to P&Ps as SOPs (standard operating procedures) however for all companies, these represent the dos and don’ts of how things are done at the organization, what’s okay and not okay, communication and basic hierarchy.

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When it comes to health and safety, there are specific laws regarding documentation, and these can be found in OSHA's Code of Regulation (CFR) books 1910 (general industry) and 1926 (construction). These books have subsections that specify when a written policy, program, SOP, or assessment is needed, based on hazard exposure relevant to your organization. Some common examples include:

Respiratory Protection (1910.134). There is a law pertaining to respiratory protection, which requires employers to develop and implement a written respiratory protection program with required worksite-specific procedures and elements for required respirator use.

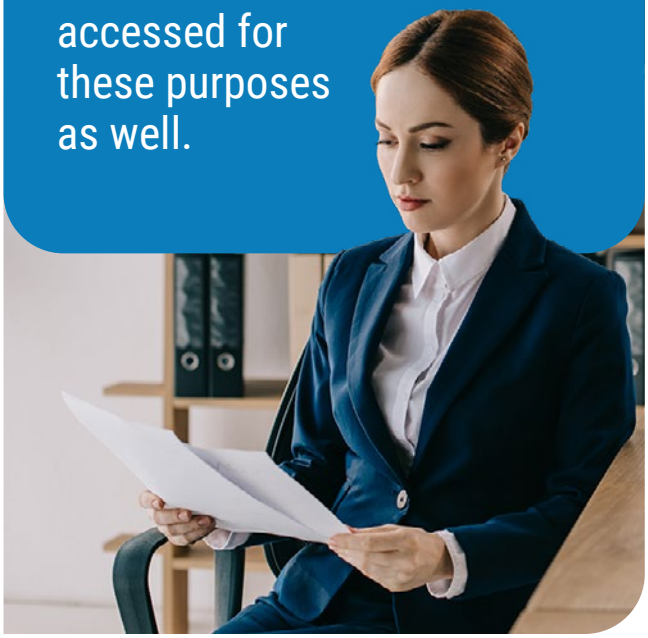
Personal Protective Equipment (PPE) (1910.132). The personal protective equipment law requires an employer to do a PPE assessment to determine which kind of PPE is required in their facilities.

Lockout/Tagout (1910.147). Logout/tagout regulations require employers to have step-by-step lockout procedures for each piece of equipment with more than one power source.

Because potential hazards differ from employer to employer, and from workplace to workplace, **it is the responsibility of the employer to determine which of these specific laws pertains to a given work environment.**

Once you know which individual laws apply to your work setting, check to see if those individual laws require anything to be in writing.

It's also worth asking if your company has a legal expert they consult with on a regular basis who could be accessed for these purposes as well.



Once you know which individual laws apply to your work setting, check to see if those individual laws require anything to be in writing. To take the respiratory protection example: This law requires a written program, which must include medical evaluations, fit testing for respirators, procedures for cleaning and storing those respirators, and so on. Often the insurance carrier or broker at your organization will provide consulting services to assist in determining which laws apply to your specific work setting. It's also worth asking if your company has a legal expert they consult with on a regular basis who could be accessed for these purposes as well.

In 2021, OSHA issued an emergency temporary standard (ETS) regarding COVID-19 and protecting employees in the healthcare workplace. OSHA has created additional guidelines for all employers regarding creating a COVID-safe workplace, which include written programs and other documentation. To learn more about COVID-19 specific OSHA guidelines and laws, visit the OSHA COVID-19 page. In addition, the federal government launched COVID.gov as a resource to help connect you and your employees with information on testing, treatment, respiratory protection, and vaccines.

3 Third Essential Element: Training

Just as OSHA requires certain written programs, policies, SOPs, and assessments, each specific OSHA law may include mandatory training requirements. And yes, OSHA regulations for training are just as specific as they are for written programs and policies.

You will want to ensure any training you are developing, purchasing, or currently using covers everything OSHA requires for a particular subject. Some of the topics where a federal OSHA regulation states employees must be trained if there is workplace exposure include:

- Hazard Communication
- PPE
- Forklift Operation
- Exit Routes and Emergency Planning
- Fire Extinguisher
- First Aid and CPR
- Respiratory Protection
- Welding and Cutting
- Electrical
- Fire Protection
- Scaffolding
- Bloodborne Pathogens
- Confined Space
- Lockout-Tagout
- Slips, Trips, and Falls
- Chlorine, Formaldehyde, and Hydrogen Sulfide
- And many more topics!

Because the number of topics is so vast, a training needs assessment can be an invaluable tool. A proper assessment will take into account the hazards potentially present in your workplace and recommend the training required. The assessment report should also cite the relevant OSHA laws involved and the required frequency of training. (A sample of HSI's training needs assessment can be found here.)

Training Best Practices

Identifying training needs is just the first step. Not only should your training comply with the minimum requirements outlined by OSHA, but it should also incorporate best practices, such as unique hazards and risks that are specific to your industry and/or worksite that aren't specifically mentioned but relevant to your workplace.

It is not enough to simply hand employees a written copy of policies to sign. Reading a document is not sufficient for giving employees the knowledge and skills they need to stay safe. Training delivery methods must be designed with instructional design principles in mind and delivered in a way that actually promotes safe behavior in the workplace.

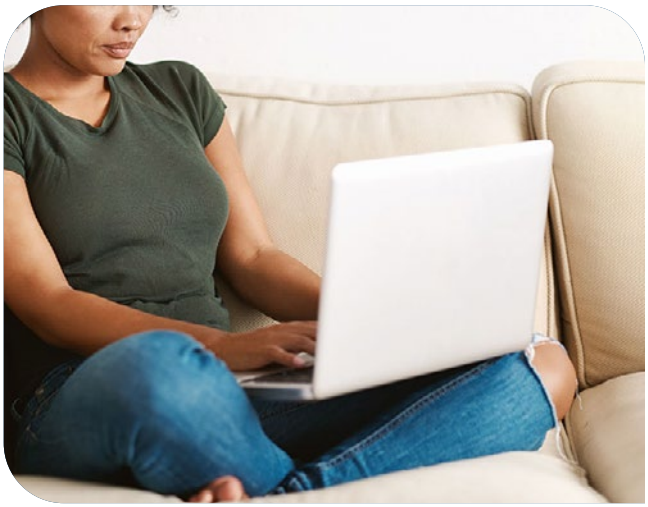
As a former OSHA Investigator, I saw this all the time—an employer would provide a policy for an employee to read and sign off on, call it "training" and think they were compliant. Sadly, that does not provide for knowledge transfer of critical information, **and it always resulted in a citation from me.**

—Jill James, Chief Safety Officer at HSI

For example, training programs around health and safety topics should follow these best practices at a minimum:

- **Understandable:** Training needs to be in a language that employees can easily understand (i.e., provided in multiple languages, with no use of jargon or "legalese").
- **Practical:** The material is made relevant to the contexts in which employees routinely find themselves.
- **Consistent:** Training is consistent across all locations where you do business and across all trainers/managers who provide training.
- **Engaging:** Inclusion of visuals, practical examples, and/or interactive activities to enhance learning and retention.
- **Effective:** Employees are tested or otherwise assessed at the end of the training to confirm appropriate knowledge transfer.

Training can either be **synchronous** (led by an instructor in real time) or **asynchronous** (material that employees can watch or review at any time).



Ideally, the best training programs leverage a **"blended" approach that uses both.**

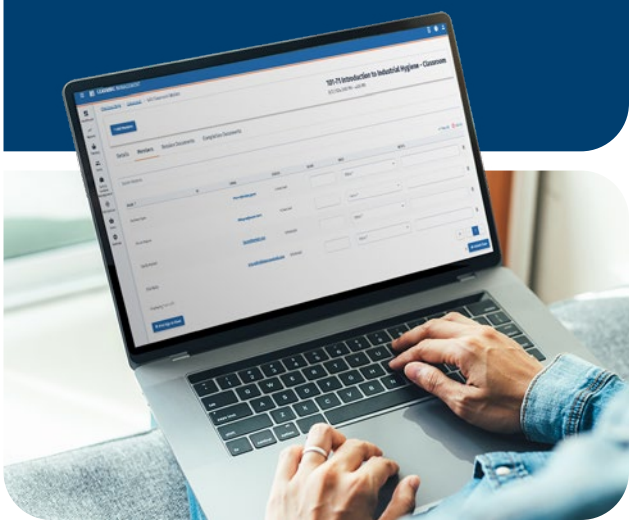
Application of Training

After you are sure your training program has met all the compliance requirements on a required OSHA topic, you should also ensure it includes how this information applies to your organization's work environments. The application of what was learned to real-world settings is where the blended training approach is ideal.

For example, you might provide online training on hazard communication to ensure OSHA compliance on that topic, but then follow up with a mini-training session discussing which hazardous substances your employees are likely to be exposed to, and how they will access appropriate SDSs, should they need them.

Tailoring your training to fit actual working environments does two important things. First, it provides an experiential component to your training. Experiential learning has been shown to be an important part of the way in which adults learn, remember, and apply their learning in context. Second, it makes their training immediately relevant to their daily work, thus providing a vital connection to their actual day-to-day behaviors.

Many online, digital systems track live training as well, whether conducted on-site or off-site by internal trainers or outside contractors.



Documenting Training

Finally, you must be able to prove you've provided the training, the frequency with which you've provided it, and the content of the training. This is a paper trail you'll need for insurance audits, OSHA inspections, and grants audits (if you operate under grant funding). If your company uses an LMS or HRIS (human resources information system), find out what programs are being used and integrate safety training documentation. Many online, digital systems track live training as well, whether conducted on-site or off-site by internal trainers or outside contractors.

4 Fourth Essential Element:
Tracking Risk

Tracking risk is where the rubber meets the road when it comes to workplace safety. Traditionally, risk-tracking has been the specialty of health and safety professionals, however it's ideal if risk tracking involves many departments, managers, and employees.

Some examples of risk-tracking activities include the following:

Inspections and Reporting

Regular inspections help to identify hazards. While many health and safety professionals have a mental checklist of possible hazards, having a written checklist (along with some training) can help anyone in the organization to spot most hazards.

Some third parties, such as HSI, provide standard checklists for this purpose. For example, our Safety Management System (SMS) contains over 100 safety checklists, which are mapped to OSHA regulations, to identify hazards in the workplace. In addition, HSI produced a series of Supervisor Safety Tip videos to teach hazard-recognition skills, one topic at a time. These include topics such as how to inspect a fire extinguisher, how to check machine guarding, and so on. Working these checklists and topics into your existing training will help put "more eyes on risk reduction" when it comes to safety.

Note, too, that contacting OSHA is also an option here. OSHA has a non-enforcement On-Site Consultation Program, which can send a professional to help identify hazards that need to be abated without the inspection being considered an official audit.

Safety Alerts

Your organization should have quick, efficient ways to send safety alerts to specific locations, or to all staff, when there is a need to convey urgent issues. Examples of safety alerts could include extreme weather conditions, a hazardous condition in an area to be avoided during clean-up, etc. It's very likely there is already a system of employee communications/notifications at your company for things like benefits, timecards, scheduling and other company news, maybe through a regular newsletter. Either include safety alerts into this existing communication or work on a safety specific newsletter, employee message board or email that is distributed by existing systems. You can even add safety-specific text message alerts.

Health Assessments and Infectious Disease Tracking

The pandemic has shone a light on health assessments and infectious disease tracking. The truth is that many organizations have been required to do some sort of health assessments and tracking for years, and this isn't going away.

For example, your organization might need to do medical monitoring and recordkeeping for things like the following:

- Audiometric Testing (hearing tests)
- Respirator Medical Evaluation
- Bloodborne Pathogen Post-Exposure Follow-Up
- Hepatitis B Vaccine Status (or other vaccine status)
- Mantoux Skin Testing (TB/tuberculosis-related test)
- Blood Lead Testing
- COVID-19 Health Screening (or other infectious disease screening)

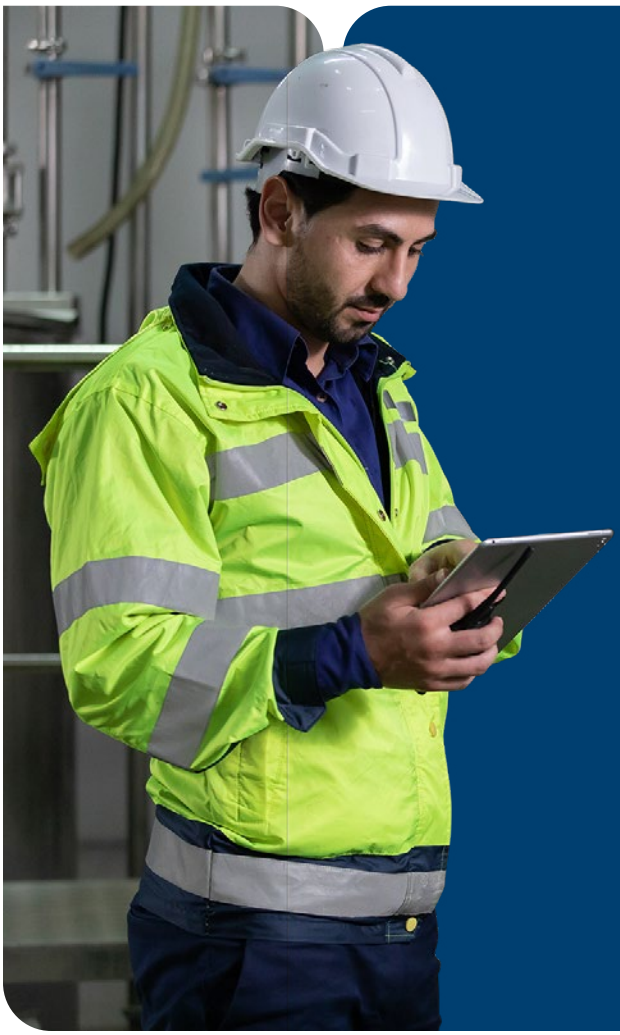
As with SOPs and training, the employer is responsible for knowing which specific forms of assessment and tracking are required.

Remediation

The final step of tracking risk will be to have workflows to remediate any issues and to assign tasks within those workflows. Some items can be taken care of easily and immediately, while others might need to be put on a capital improvement budget. Having all of this data in one place will allow you to prioritize based on risk and budget.

Most employers have safety committees, as required by law in many states. Often safety committees are responsible for reviewing inspection information, triage of remediation activities and reporting findings to the appropriate member of the management team.

Safety meetings or "toolbox talks" might be part of remediation and training efforts as well. Remember that certain action items might follow as a result of those meetings.



Having electronic workflows for safety remediation activities brings the safety professional into the 21st century and removes the reliance on Post-it® Notes, spreadsheets, clipboards and conversations in the hallway. This ensures remediation will not only be identified but followed through and completed, and **provides the "papertrail" [electronically] to prove your good faith efforts as an organization.**

—Jill James, Chief Safety Officer at HSI

5 Fifth Essential Element: Reinforcing Behaviors

What happens when employees don't perform to your organization's standards? As an employer, you can determine your enforcement policy, just like any other HR policy. Your workplace might already enforce a tardiness policy, for example...so just imagine how much more important it is to enforce proper health and safety procedures. Since HR already has existing policies regarding employee behavior, which typically include expectations and consequences, you can easily add safety specific policies that follow the same pattern of reinforcement. Policies that govern workplace behaviors like showing up on time, using the timecard system, should include policies about use of PPE and what the consequences are of not showing up prepared to work safely.

Reinforcement may start with retraining. Employees might have simply forgotten your procedures or misunderstood their application. While discipline might be included in enforcement activities, reinforcing safe and healthy behaviors is not the same as discipline. Observation is an important factor in this element; observing employees' behaviors to intervene when unsafe practices are seen, as well as to recognize safe behaviors.

When enforcing procedures, it is also important to keep an electronic record. Make and log observations of safe and unsafe workplace behaviors and practices. Those notes will help identify where training might need to be refreshed, and which employees (if any) fail to follow health and safety procedures despite training.

Your workplace might already enforce a tardiness policy, for example... so just imagine how much **more important it is to enforce proper health and safety procedures.**

What About Work From Home?

With many companies having recently transitioned to a work-from-home (WFH) or a hybrid work environment, questions inevitably arise about the applicability of OSHA regulations and workplace safety requirements. The important point to keep in mind is that OSHA requirements, and thus these five elements, still apply for employees working at home. EHS professionals must still move forward with safety initiatives, even if some or all the workforce is not physically on-site. For example, some of those initiatives would include the following:

Documentation. Even if employees work from home, they still need to be aware of the information on the OSHA poster. You can send the information to your work-from-home employees electronically. The same goes for the OSHA 300 Log: you still need to log illnesses and injuries that might occur at home as a result of their work and make the annual summary (300A) available electronically.

Tracking Risk. Home workspaces can have hazards, too. Home workstations are ground zero for musculoskeletal injuries that arise from hours spent at a computer. It is still the employer's responsibility to ensure employees have an ergonomic workstation in their home office. Employers should be proactive when it comes to detecting, tracking, and mitigating those at-home risks (including hazards beyond the workstation, like electrical or slips, trips, and falls). This might require assessment, education, and prevention, as well as processes for requesting appropriate equipment, to name a few.

Training. High-quality health and safety training is easily accessible online, either through instructor-led training or group discussion (synchronous learning) or self-paced online courses and materials (asynchronous learning). Online resources not only make training available from home, they also make it easier to track viewership and ensure compliance.

OSHA requirements, and thus these five elements, **still apply for employees working at home.**

Still Have Questions?

These five essential elements are the foundation of a successful health and safety program at your workplace but are just the beginning and entail continuous work, evaluation, and revision. This work is easier if you are using technology to implement and manage these five elements.

Your organization likely already uses an HR information system (HRIS) for time-tracking, benefits and payroll, an accounting system, customer management software, or a purchasing software system. Technologies such as learning management systems (LMS), Safety Data Sheet (SDS) platforms, and safety management systems (SMS) are invaluable for moving safety beyond clipboards and Excel sheets. A comprehensive solution with single sign-on for you and others at your organization can elevate your health and safety plan to the same level as other systems across your organization.

This White Paper has two other related documents you might find helpful:

- **White Paper:** Safety is Everyone's Job: Organizational Collaboration
- **Checklist:** Five Essential Elements of Workplace Health and Safety

About HSI

HSI is your single-source partner for EHS, Compliance, and Professional Development solutions. HSI provides integrated e-learning content, training solutions, and cloud-based software designed to enable your business to improve safety, operations, and employee development. Across all industries, HSI helps safety managers, and technical employees, human resources, first responders, and operational leaders train and develop their workforce, keep workers safe, and meet regulatory and operational compliance requirements. HSI's focus is on training, software, and services for safety and compliance, workforce development, industrial skills, and emergency care. HSI is a unique partner that offers a suite of cloud-based software solutions including learning management, safety management, chemical SDS management, and more, integrated with content and training so businesses can not only monitor and manage multiple workflows in one system, but train employees via one partner.

For more information, visit **hsi.com**