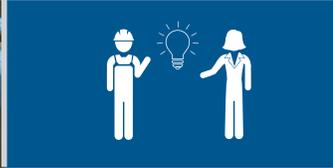
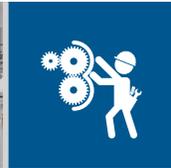


Recommended Practices for Safety and Health Programs

Example Safety and Health Program



This document presents an example safety and health program for a fictitious small business, “Local Dry Cleaners.” It illustrates simple approaches that a small business can use to begin implementing the core elements of a safety and health program, as described in OSHA’s *Recommended Practices for Safety and Health Programs*. It is not intended to represent a

completed program; rather, it can serve as a roadmap for beginning a program to be refined, evaluated, and improved over time. By intent, it does not include details that would be unique to this business, such as specific controls selected. You will need to adapt the general information presented here to your own situation and fill in such details.

SAFETY AND HEALTH PROGRAM FOR LOCAL DRY CLEANERS [A FICTITIOUS BUSINESS]

Local Dry Cleaners is a (fictitious) family-run business with 19 workers at two locations in a small city. Most of the workers are recent immigrants who speak Spanish as their first language. Celia Martinez is the owner. There are three managers: Ms. Martinez’s daughter is the general manager, and two store managers supervise operations at the two locations.

Workplace activities include the following (most workers perform several of these tasks):

- Cleaning (using machines and chemical spot-cleaning)
- Folding
- Pressing
- Tailoring
- Machine maintenance
- Driving
- Customer service

Workers at the company have experienced three lost-time injuries in the past two years. The owner recognizes that all of the injuries were preventable. In addition, one worker has expressed concern about chemical exposure. Ms. Martinez has decided to begin implementing a safety and health program using OSHA’s *Recommended Practices for Safety and Health Programs*. The owner has worked with the managers and workers to put together the program shown on the following pages.



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A. MANAGEMENT LEADERSHIP

A.1 COMMUNICATING OUR COMMITMENT TO SAFETY AND HEALTH

OUR POLICY: The safety and health of our workers is the first consideration in operating Local Dry Cleaners (a fictitious business). Our philosophy is that all workplace injuries and illnesses can be prevented. To achieve this, management maintains a comprehensive safety and health program. Management is committed to continuous improvement of workplace safety and health. Management provides the resources, training, expertise, and equipment needed for a safe and healthful work environment.

The owner will communicate this policy on a continual basis to our workers, customers, and vendors. The owner will ensure that this policy is posted prominently in both storefronts, on our website, and in our customer newsletter.

A.2 PROGRAM GOALS

The table on the next page shows initial program goals with information to be filled in as the program is developed. The owner will share these goals with all workers, work with workers to refine the goals, and revisit them on a quarterly basis to determine progress and whether they should be revised. We have selected goals to improve in areas where we are performing poorly.

A.3 RESOURCES

- Management will ensure adequate resources to set up and maintain the program. The general manager, with the owner's guidance, will budget for the following expenses as needed: training, equipment maintenance and upgrades, personal protective equipment, substitute chemicals or other products, and materials to support the program such as safety manuals and new signage/posters.
- The owner and general manager will review the budget each quarter and update it as needed.

A.4 EXPECT PERFORMANCE

- The owner will:
 - Oversee program development and implementation.
 - Ensure adequate resources for the program.
 - Designate the manager at each location as responsible (with worker participation) for

ensuring regular workplace inspections, incident investigations, and followup on corrective actions.

- Lead formal worker discussions about safety and health and our program.
- Communicate our policy to customers and vendors.
- Investigate all incidents and "close calls/near misses."
- Encourage workers to report safety and health concerns through an "open-door" policy and other means (see Section B).
- Lead safety and health inspections at both locations.
- Determine whether program goals are being met.
- Lead review of the program to see where it needs improvement.
- Managers will:
 - Set a good example by always following safe work practices.
 - Ensure that equipment and work areas under their direction are safe, well kept, and in compliance with applicable regulations and program requirements.
 - Ensure that procedures are being followed for safe use of hazardous substances.
 - Ensure that workers are adequately trained in safe work procedures and all other aspects of the program.
 - Participate with the owner in regular safety and health inspections and incident investigations at their location.
 - Verify that corrective actions are implemented following incidents and identification of hazards.
 - Create an environment where reporting of safety and health concerns is welcomed.
 - Respond within 24 hours to reports of safety and health concerns.
- Workers will:
 - Follow the company's procedures and policies for working safely.
 - Participate in the safety and health program.

Safety and Health Program Goals

Program Element	Goal	By When?	Who?	Tasks	Resources Needed	Completion Date/Notes
Management leadership	<p>Hold special meeting with all workers to kick off the program. Topics include our policy, roles and responsibilities, and avenues for communication.</p> <p>Revise signage, website, and promotional materials to include statement of commitment.</p> <p>Develop a company manual on our safety and health policies and procedures.</p> <p>Budget for materials, training, equipment upgrades, PPE.</p>					
Worker participation	<p>Invite input on program goals (at kick-off meeting and afterwards).</p> <p>Include workers in developing hazard checklist and (on rotating basis) conducting regular inspections at each location.</p> <p>Develop and explain clear procedures for reporting incidents, injuries, illnesses, and close calls/near misses.</p> <p>Begin incentive program for identifying hazards.</p>					
Hazard identification and assessment	<p>Develop a checklist of hazards to look for; update it regularly.</p> <p>Conduct regular inspections using the checklist.</p> <p>Obtain consultation on all hazards (and immediately on chemical exposure concerns).</p> <p>Establish clear protocol for investigating incidents and close calls/near misses and communicate it to all workers.</p> <p>Develop, discuss, and post emergency procedures (fire, chemical spill, etc.).</p>					
Hazard prevention and control	<p>Select and implement proper controls for all hazards identified.</p>					
Education and training	<p>Ensure that all workers are trained on how to identify and control hazards as well as the safety and health program.</p> <p>Train workers on the company's safety and health policies and procedures.</p>					
Program evaluation and improvement	<p>Consistently track measures that show whether we are implementing the program and whether it is working.</p> <p>Review and update the program twice a year.</p>					

B. WORKER PARTICIPATION

B.1 ENCOURAGE WORKERS TO PARTICIPATE IN THE PROGRAM

- People on the job often know the most about potential safety and health hazards. Therefore, management will involve workers in all aspects of the program, as detailed in Section B.4 below.
- To encourage participation, the general manager will set up an incentive program, such as quarterly awards of a gift certificate for prompt reporting of hazards, close calls/near misses, or concerns that could prevent injuries or illnesses.
- The owner will communicate an “open door” policy encouraging workers to speak to the owner and/or managers about safety and health at any time.
- The owner will request feedback from workers—during one-on-one discussions and at company meetings—on how the program is working.

B.2 ENCOURAGE WORKERS TO REPORT SAFETY AND HEALTH CONCERNS

- The owner will instruct workers to report concerns directly to their manager or the owner.
- The general manager will provide a suggestion box at each location in case a worker wants to report a concern anonymously.
- The owner (or a manager, if the owner is not available) will respond in person to reports of injuries, illnesses, and safety and health concerns within 24 hours.
- Information reported will be used only to improve safety and health in our operations, never as a basis for retaliation or discrimination.

B.3 GIVE WORKERS ACCESS TO SAFETY AND HEALTH INFORMATION

- Through company meetings, the owner will communicate the results of safety inspections, incident investigations, injury and illness statistics, and other safety-related issues to all workers.
- To help workers understand hazards in our workplace, the owner (working with the managers) will ensure that workers have access to relevant safety information such as SDSs, equipment safety instructions, and any industry trade publications.

B.4 INVOLVE WORKERS IN ALL ASPECTS OF THE PROGRAM

- The owner (working with the managers) will involve workers in all aspects of the program, such as:
 - Developing the program and setting goals.
 - Finding and implementing solutions to safety and health issues.
 - Documenting safe work practices.
 - Conducting workplace inspections.
 - Investigating any incidents.
 - Reviewing and improving training programs.

B.5 REMOVE BARRIERS TO PARTICIPATION

- The owner will ensure that workers will not face retaliation or discrimination or be discouraged or deterred from participating in the program.
- The owner (or a manager, if the owner is not available) will respond in person within 24 hours to reports of injuries, illnesses, and safety and health concerns.
- The owner (with assistance from the general manager) will adopt incentives for reporting concerns and near-misses (see B.3).
- The owner will ensure that all training and education materials are understandable for all workers (in Spanish and English, plain language).

C. HAZARD IDENTIFICATION AND ASSESSMENT

C.1 COLLECT INFORMATION ABOUT WORKPLACE HAZARDS

- The owner (with assistance from the general manager) will review relevant information about potential safety and health hazards, including:
 - Applicable OSHA standards.
 - Information about past incidents, injuries, and illnesses.
 - Safety data sheets (SDSs) for hazardous chemicals that we use.
 - Equipment safety information.
 - Close call/near miss reports.
 - Input from all workers about possible hazards.
 - Information from OSHA, National Institute for Occupational Safety and Health (NIOSH), or industry trade associations that may be relevant for our workplace.

C.2 INSPECT THE WORKPLACE

- The owner (or designated manager) will develop, use, and regularly update a checklist of potential job hazards (see example, page 7).
- Using the checklist, the owner (or designated manager) will conduct inspections at both locations at least every month; whenever a worker raises a safety or health concern; or whenever we change processes, equipment, or materials.

C.2 IDENTIFY HEALTH HAZARDS

- The owner (or designated manager) will identify any sources of health hazards in our workplace such as:
 - Chemical hazards – by examining SDSs and product labels to identify chemicals in use.
 - Physical health hazards – by considering exposures to noise or heat.
 - Biological hazards – by considering exposures to bodily fluids, molds, or animal materials.
 - Ergonomic hazards – by evaluating activities involving repetitive motions, heavy lifting, work above shoulder height, or vibration.

C.3 CONDUCT INCIDENT INVESTIGATIONS

- The owner (or designated manager) will investigate injuries and illnesses to identify hazards and systemic failures that might have caused those injuries and illnesses. They will:
 - Train the people conducting investigations (managers and workers) on incident investigation techniques, emphasizing the need to be objective and open-minded throughout the investigation process.
 - Investigate facts and determine the root causes of all injuries, illnesses, and incidents.
 - Initiate investigations within 24 hours of any incident being reported.
 - Use OSHA Form 301 to collect information on all incidents.
 - Use a corrective and preventive action process following the investigation. We will:
 - ♦ Document findings and recommended corrective actions.
 - ♦ Describe how the recommendations will be implemented.
 - ♦ Verify completion.
 - ♦ Incorporate the action into our program.
 - ♦ Communicate findings and solutions to workers.
 - ♦ Monitor the corrective and preventive action(s) to determine their effectiveness.

C.4 IDENTIFY HAZARDS ASSOCIATED WITH EMERGENCY AND NON-ROUTINE SITUATIONS

- The owner (with workers' input) will assess emergency scenarios and non-routine tasks our workers might encounter, such as fires, chemical spills, weather emergencies, medical emergencies, or workplace violence.

C.5 CHARACTERIZE THE IDENTIFIED HAZARDS, IDENTIFY INTERIM CONTROLS, AND PRIORITIZE HAZARDS FOR CONTROL.

- For the hazards identified, the owner (with workers' input) will prioritize the need for control by considering:
 - The severity of the hazard;

- The likelihood, frequency and duration of worker exposure; and
- The number of workers exposed.

- The owner (or designated manager) will implement any readily available interim controls immediately, while investigating the most effective, permanent controls.

D. HAZARD PREVENTION AND CONTROL

D.1 IDENTIFY CONTROL OPTIONS

For hazards we identify or anticipate, the owner (with the general manager's assistance) will gather and evaluate information about appropriate controls from the following sources:

- OSHA standards and other information from the OSHA website.
- Input from workers.
- Industry best practices.
- National Dry Cleaners Association.
- Information from equipment and service vendors and suppliers.
- Consultation with technical experts (e.g., OSHA On-Site Consultation program at no-cost, <http://www.osha.gov/consultation>).

D.2 SELECT CONTROLS

- The owner (with workers' input) will select controls as follows:
 - If an OSHA standard specifies the control method for an identified hazard, the owner will select that control.
 - The owner will select an appropriate control method by following the "hierarchy of controls" (as identified in OSHA's Recommended Practices) and by using the information obtained from the sources listed above.
 - The owner will also consider cost, ease of implementation, and how quickly the controls can be installed.

D.3 DEVELOP AND UPDATE A HAZARD CONTROL PLAN.

- To develop a hazard control plan, the owner (with workers' input) will:
 - Plan to control hazards covered by OSHA standards.
 - Plan to control hazards likely to cause serious injuries or illnesses.
 - Plan to control all hazards that can cause injuries or illnesses, regardless of how serious.
 - Prioritize hazards for control based on the seriousness of the injuries or illnesses that could result and get worker input on our reasoning.
 - Use the worksheet on page 11 to help us develop our hazard control plan.
 - Update the plan as it is implemented and evaluated (see D.6).
- For hazards that we can't control immediately, the owner (with workers' input) will:
 - Select and provide interim controls to protect workers or remove workers to prevent them from being exposed to the hazard.
 - Set up a schedule, assign responsibilities and tasks, and monitor our progress in implementing permanent controls.
 - Implement permanent controls, starting with controls for the highest-priority hazards.
- The owner (with the general manager's assistance) will document the control measures and hazard control plan in writing.
- The owner and managers will make the hazard control plan available to all workers and discuss it at company meetings.

Checklist to Identify Hazards

	Location	Safe	Unsafe	Comment/Action Required/ Person Responsible	Completion Date
1. Hazardous Substances (Chemical and Biological)					
Are there SDSs for all hazardous chemicals used in the workplace?					
Do all workers have access to SDSs?					
Have all workers received training on the SDSs for the hazardous chemicals used in the workplace?					
Are all chemicals properly labeled?					
Are controls in place to prevent chemical exposure?					
Are chemicals stored away from sources of ignition or reactives/incompatible substances and in tightly closed containers?					
Is any required personal protective equipment available, in good working order, and used by workers?					
Are procedures in place and followed to prevent exposure to laundry contaminated with blood/bodily fluids?					
Are procedures in place and followed to prevent needle stick injuries?					
Are all workers adequately trained in preventing injury and illness from biological and chemical hazards?					
2. Machinery					
Is all equipment in good working order?					
Is a fault reporting and tagging system in place?					
Does all machinery have guarding to prevent contact with moving/hot/otherwise hazardous parts?					
Is lint cleaned from screens and filters as required by the equipment manufacturer?					
Is everyone who operates machinery adequately trained in using it safely?					

Checklist to Identify Hazards

	Location	Safe	Unsafe	Comment/Action Required/ Person Responsible	Completion Date
3. Electrical					
Is all electrical equipment in good condition and free from damage?					
Are outlets and other electrical equipment used in wet areas suitable for that type of work?					
Is electrical equipment inspected and tested by an electrician?					
4. Heat Stress					
Is there adequate ventilation or air conditioning?					
Do workers know how to prevent heat stress (water, use of cooler rest areas?)					
5. Ergonomics					
Are workers able to perform tasks upright and without awkward twisting motions?					
Do workers have frequent breaks or variation from repetitive tasks?					
Is the need to lift or move heavy items minimized or eliminated (using mechanical aids, smaller loads, etc.)					
6. Slips, Trips, and Falls					
Is lighting adequate and in good working order?					
Are all walking surfaces in good repair and free of slip/trip hazards?					
Are aisles and walkways clear of boxes, trash, leads, or other tripping hazards?					
Are spills/wet surfaces cordoned or marked off and/or cleaned up immediately?					
Are non-slip/fatigue mats in place?					

Checklist to Identify Hazards

	Location	Safe	Unsafe	Comment/Action Required/ Person Responsible	Completion Date
7. Emergency Procedures					
Are all workers trained in emergency response plans and procedures (such as for fire, chemical spill, robbery, natural disaster)?					
Is the emergency plan and emergency phone numbers clearly posted?					
Are all emergency exits clearly marked and free from obstacles?					
Are emergency exit doors unlocked on the inside so that workers can immediately exit the facility during an emergency?					
Is emergency-related equipment readily available and in working order (chemical spill kit, first aid kit, fire extinguishers)?					
8. Vehicle Safety					
Are all vans in good repair?					
Are all drivers trained in and following driver safety policies (seat belt use, cell phone use prohibitions, avoiding substance use, etc.)					

D.4 SELECT CONTROLS TO PROTECT WORKERS DURING NON-ROUTINE OPERATIONS AND EMERGENCIES

- The owner (with workers' input) will develop plans and procedures to respond effectively and safely in situations identified under C.4 (fires, chemical spills, etc.).
- The owner will obtain any equipment needed to control emergency-related hazards.
- The owner (or a designated manager) will incorporate the plans and procedures into our training (E.3) and conduct emergency drills at **least twice a year**.

D.5 IMPLEMENT SELECTED CONTROLS IN THE WORKPLACE

- The owner (or a designated manager) will implement the selected controls according to the priorities in the hazard control plan.
- The owner (or a designated manager) will make “quick fixes” (such as removing tripping hazards) on an ongoing basis regardless of their priority level.

D.6 FOLLOW UP TO CONFIRM THAT CONTROLS ARE EFFECTIVE

- The owner will verify that the control measures have been implemented according to schedule.
- The owner (or a designated manager) will verify that engineering controls have been properly installed and tested.
- The owner (or a designated manager) will verify that all workers understand the controls, including safe work practices and personal protective equipment (PPE) use requirements.
- The owner (or a designated manager) will conduct regular inspections to confirm that (1) engineering controls are operating as designed and have not been removed or deactivated, and (2) work practices, administrative controls, and personal protective equipment use policies are being followed.
- The owner (or a designated manager) will conduct routine preventive maintenance of equipment, facilities, and controls to prevent incidents due to equipment failure.
- The owner (with the general manager's assistance) will track injuries and illnesses that the controls were selected to prevent.



Worksheet: Hazard Control Plan

Unsafe Condition or Work Practice	Location	Control Selected	Date Implemented	Interim Controls Selected/Date Implemented	Who is Responsible for Implementing Permanent Hazard Control Measure?	Tasks	Schedule	Measure of Progress

E. EDUCATION AND TRAINING

E.1 PROVIDE PROGRAM AWARENESS TRAINING

- The owner will ensure that all workers receive training on the program, including its overall goals, how to report hazards, and how to participate in the program.
- The training will occur at least every year and will be held for any new hires.
- The owner will make sure all training is conducted in language and vocabulary understandable to our workers.
- The general manager will maintain records of all completed training (see training record below).

E.2 TRAIN MANAGERS AND SUPERVISORS ON THEIR ROLES IN THE PROGRAM

- The owner (or a designated manager) will provide training to managers and supervisors covering:
 - Their responsibilities under the OSH Act and workers' rights guaranteed by the Act.
 - Procedures for responding to workers' reports.
 - Basic concepts of hazard control, including the hierarchy of control (see D-2).
 - Basic principles of incident investigation including root cause analysis.

E.3 TRAIN WORKERS ON THEIR ROLES AND RESPONSIBILITIES IN THE PROGRAM

- The owner (or a designated manager) will provide training to ensure that every worker knows how they can contribute to the program (especially the importance of reporting safety and health concerns before they cause any injuries and illnesses).
- The training will include opportunities for questions, answers, and feedback.

E.4 TRAIN WORKERS ON HAZARD IDENTIFICATION AND CONTROLS

- The owner (or a designated manager) will provide all training required by OSHA standards, as well as other training on recognizing and controlling hazards in both facilities.



Worker Training Record

Worker's Name	Date of Training	Type of Training	Trainer(s)

F. PROGRAM EVALUATION AND IMPROVEMENT

F.1 MONITOR PERFORMANCE AND PROGRESS

- The owner (with the general manager's assistance) will track the following measures to help monitor program effectiveness:
 - Number of inspections conducted.
 - Number of hazards and close calls/near misses reported.
 - Amount of time taken to respond to reports.
 - Timeliness in completing corrective actions.
 - Number of injuries and illnesses avoided compared to a similar timeframe in the previous year.
 - Feedback from managers and workers on program effectiveness.

F.2 VERIFY THE PROGRAM IS IMPLEMENTED AND OPERATING

- The owner will review our program at least twice a year to make sure that it is being implemented as designed and helping us meet our goals.
- The owner will involve workers in reviewing the program and revising program goals if needed.
- The owner will communicate the results of the review to all workers.

F.3 CORRECT PROGRAM SHORTCOMINGS AND IDENTIFY OPPORTUNITIES TO IMPROVE

- The owner, with workers' input, will revise our program at least once a year to correct any deficiencies and implement improvements.
- The owner will set new or revised goals for the next year.
- The owner will assign responsibilities and provide resources needed to address deficiencies or meet new goals.

