

How To Create a Safety Program

A roofing contractor's safety program may originate from a variety of initiatives, some voluntary, others compelled by third parties such as insurance carriers, general contractors or government agencies. Whatever the initial driving force to create a safety program, only a genuine commitment from company owners and managers to protect their most valuable asset—their workers—will give a program strength and sustainability. The basic structure of a safety program follows a model similar to this:

1. Development and implementation of a **company safety policy**
2. Writing and/or compiling **work rules and practices**
3. **Training of workers** in those work rules and practices
4. Delineation of safety **responsibilities** of roofing workers and management
5. **Discipline and incentive procedures** for penalizing infractions and rewarding compliance with program rules
6. **Regular review and amendment process** for program provisions, including a safety committee that has staff members representative of all levels of the organization.

Company Safety Policy

The company safety policy is the formal statement by the company that sets forth the attitudes, values and beliefs about safety that form the basis for an effective safety program. Independent research cites a strong safety culture as having the single greatest impact on accident reduction of any process employed by management. Safety culture can be defined as an attitude toward safety that exists at a company that shapes the behavior of workers.

A company with a strong safety culture establishes an atmosphere where safety is a primary responsibility of all workers from the newest apprentice to the owner or CEO. The company safety policy provides the preliminary foundation for development of a strong safety culture by setting the value of employee safety held by the company. Safety programs, training, responsibilities, accountability and rewards build off the fundamental philosophy of that policy. Evidence of a company's commitment to a safety policy can include:

- Establishing a formal safety budget:
 - accident investigation expenditures
 - special safety training events, like quarterly meetings
 - salaries for workers attending the training
 - food, beverage and meeting expenses
 - prizes
 - worn safety equipment replacement
 - new safety equipment
 - incentive program prizes

- safety committee budget
- Hiring a safety director (part-time or full-time) with specific safety-related duties
- Establishing company safety goals and objectives
- Providing regular safety training and educational programs
- Establishing and enforcing disciplinary procedures
- Developing a defined structure of management and employee accountability and responsibility

The company health and safety policy template in the NRCA Safety Manual appendix (included on this CD) provides the basic language a company may use in first setting out its safety policy. The template can be enhanced to include detailed and specific company information such as its history or origin. The approach to safety set out in the template also can be expanded upon to define the company philosophy and objectives more specifically. This should be the first document that a roofing contractor develops because it forms the basis for the entire safety program.

Work Rules and Practices

OSHA regulations set out minimum safety standards to be followed by employers for worker protection. These standards are federal standards but some states have developed their own rules that must be followed by employers working in that state--so-called state plan states. Insurance companies, general contractors and building owners may require compliance by the roofing contractor with additional safety rules not covered by OSHA or a state plan.

In this program, federal OSHA regulations provide the basis for most of the explanations set out in the NRCA Safety Manual chapters although best work practices are also discussed throughout the explanations and highlighted at the end of each chapter. This program allows the user to supplement the rules and practices discussed in each chapter with company-specific or project-specific rules as a means of customizing the safety program to a particular customer or jobsite. Project-specific rules can be developed independently by the contractor, set out by a third party or sometimes result from the use of job-hazard assessment tools. The NRCA explanation along with user-supplemented material makes up the work rules and practices section of the safety program being developed.

Training of Workers

This section of a safety program will set forth the programs, procedures and techniques for training new workers or current workers' changing job duties, providing instruction to all workers on new rules or equipment, retraining workers after injuries or accidents, conducting regular safety training sessions and informing all workers of project-specific

requirements. The type of training that is conducted by most roofing contractors that should be part of the safety program includes:

- Formal training, e.g., OSHA 10- and 30-hour programs, NRCA seminars, annual, semi-annual or quarterly safety training sessions and/or meetings
- Informal training, e.g., videos, product/manufacturer training, foremen training held monthly or weekly
- On-the-job training, e.g., Toolbox Talks, daily job huddles, jobsite inspections held weekly or daily

The safety program should provide a timeframe for most training that is required under the program. For example:

- Initial or new hire training will start on the date of hire and extend for 10 classroom sessions
- Initial on-the-job training for new hires will start immediately after the classroom training modules
- Toolbox Talks will be given every morning of the day that paychecks are handed out
- Company annual training session is scheduled for the fourth Tuesday of November
- Every foreman must complete OSHA 10-hour before his one-year anniversary of hire

In addition to laying out the timeframe for training, it is essential to maintain records for training that each employee has completed and responsibility for keeping those records. Recordkeeping might take the form of keeping copies of OSHA 10- and 30-hour cards, forklift or crane certifications, and signed attendance sheets from Toolbox Talks. The company safety director or personnel director could be assigned the responsibility for maintaining these records.

Responsibilities

This portion of the safety program sets out the duties that various members of a roofing company will be responsible for in the management structure. It should state the names of the members of the safety committee (if one is in place), their duties in implementing and enforcing the safety program, and the committee procedures.

The name and contact information for the company safety director should be listed along with the duties and responsibilities of that position. These may include:

- Ensuring that all employees receive a copy of the company safety program
- Establishing a comprehensive training schedule for new hires, regular training, etc.
- Visiting jobsites for compliance inspection of safety procedures and equipment

- Selecting safety equipment, training materials and first aid supplies
- Preparing and maintaining OSHA injury forms and insurance injury-report forms
- Providing feedback on safety policies to management for amendment or addition to safety program

Similarly, duties and responsibilities of superintendents and foremen must be detailed. These may include:

- Attending, setting up or conducting safety meetings as required
- Participating in safety committee process and review of work practices
- Regularly inspecting and observing job sites for safety compliance
- Enforcing company safety program rules with discipline and incentives
- Ensuring that proper and complete training of all workers is done before they come onto the jobsite

The duties and responsibilities of roofing workers must also be set out in some detail. These may include:

- Understanding and following safety rules and procedures
- Promptly reporting accidents and injuries
- Taking part in training sessions and safety meetings
- Wearing PPE provided by the employer
- Working in a safe manner making use of all safety equipment required by their job duties
- Reporting unsafe conditions, equipment or work practices of other workers

Discipline and incentive procedures

The safety program must set out, in clear and unmistakable language, the consequences for violating any company safety provision. Employees must know that if they fail to follow safe procedures, they will be disciplined according to a strict, concise and unequivocal process. A disciplinary procedure that is communicated and followed enforces the idea of the company safety culture and assures the employees that company management is serious about safety and the well-being of its workers. Discipline may follow a structure a 4-step process similar to this example:

- First violation: Verbal warning with written entry to personnel file
- Second violation: Written warning to employee and file
- Third violation: Suspension without pay for 2 days

- Fourth violation: Suspension pending investigation of termination and then, if approved, termination

Clearly, some safety violations may be so flagrant that a warning or suspension is inappropriate or seriously compromises worker safety that immediate suspension pending investigation of termination is demanded and followed through on. It would be difficult to prepare a comprehensive list of actions requiring such a response but certainly listing some egregious examples would be useful for inclusion in the safety program. (Note: termination should only occur after careful consideration of all the facts. Spur of the moment “firings” can lead to costly mistakes and should be avoided.)

Incentive programs are limited only by your imagination in calculating what workers would appreciate as rewards for doing excellent work in maintaining a safe workplace. Many companies use gift certificates from popular stores for crews that have achieved a certain number of work days without an accident. A pay bonus for workers completing advanced OSHA safety training or other safety coursework also inspires a worker to become a safety leader. The key is to make incentives drive safe work practices through increased training, awareness of hazards, concern for fellow workers and understanding of safety equipment and procedures. In addition, incentives should be short-term and narrowly targeted to a specific behavior change. Long-term programs tend to lose enthusiasm and connection with intended goals.

Safety program revisions

The safety director ordinarily will be the person in the company through which changes to a safety program are facilitated. This may occur directly with company management or through the safety committee process. The duties of safety director demand that he or she keep abreast of new and advanced safety equipment and techniques, maintain and review accident and injury reports, receive and discuss worker comments and complaints on current safety procedures or equipment, and inspect jobs for hazards. Because of this, the safety director is uniquely suited to compile a wide variety of pertinent information for presentation to management for analysis and incorporation into its safety program. This may take place periodically, as the result of new regulations or insurance requirements, because of a recent accident or from the introduction of new equipment. Whatever the reason, the safety program should specify how and when the terms of the program will be modified or supplemented. Revisions or additions must then be conveyed to all employees in a timely manner.

Safety Committee

A safety committee is a must for companies that want to drive safety through the organization. There are two key components to driving safe behavior: understanding of the desired behavior and commitment to behaving in a safe manner. Safety committees support these tenets when it accomplishes the following: first, the committee makeup must include at least one representative of every level of the organization, in fact, for the

first couple of committee cycles, the roofing contractor should be a member; second, all members have an equal voice and chairmanship rotates; third, members are required and given the time to follow through on all assignment; and fourth, a record of actions taken and work accomplished needs to be maintained.

A safety committee's main role is to provide the necessary field feedback on the implementation of the safety program. It needs to determine what works, what doesn't and why. It needs to consider new approaches to safety and engender support throughout the organization that safety is part of everyone's job. This is why it is so vital that a cycle be developed for sitting on the safety committee. In theory, every employee of the company, including the president, will rotate through the committee. Safety is everybody's business—from the receptionist in the office, to the laborer in the yard to the president of the company.

Speaking of the president, for a company to have safety as part of its culture the owner must commit himself or herself to safety. It will never really happen without that personal commitment and subsequent enforcement through each layer of the organization. A contractor that demands hard hats to be worn on all jobs and shows up to inspect one without wearing his or her own, will deal the biggest blow to even the most perfectly appointed safety program.

This program contains information and directions to help lead you through the process of developing or enhancing your company's health and safety program. It is NRCA's hope that through those efforts, your company's employees will benefit from a safe and healthful workplace.