SAFETY AND HEALTH PROGRAM SELF-EVALUATION TOOL FOR GENERAL INDUSTRY

COMPANY/SITE:	ADDRESS:
PREPARED BY:	DATE:
SAFETY AND HEALTH PROGRAM CONTACT:	E-MAIL ADDRESS:
	PHONE:

SECTION 1: MANAGEMENT LEADERSHIP

		Imple	mentation		
			Minor		
Action	None	Partial	Deficiencies	Full	Guidance
Management implements and communicates a written, signed policy supporting the safety and health program.					 An effective program's written policy commits the entire enterprise to continuous improvement in safety and health and integrates safety and health into all business operations. It is communicated to and understood by all. An inferior program does not include safety and health in business policies or treats safety and health as a secondary organizational value.
Management routinely demonstrates visible commitment to the program.					 In an effective program, managers walk the facility to actively look for hazards and talk to workers about the hazards they face. Safety and health topics are brought up during meetings and informal conversation. Management follows safety and health rules when walking through the facility. In an inferior program, managers assign responsibility then mostly disengage from safety and health issues.
Management defines specific goals and expectations for the program, along with plans for achieving the goals.					 An effective program's goals emphasize prevention of injuries and illnesses through active participation in the safety and health program. The goals are measurable, and the program defines specific plans or actions needed to achieve them. An inferior program has no goals, non-specific goals (such as "safer operations"), or goals that reflect only lagging performance (such as "reduce injuries by 10 percent").
Management allocates appropriate resources (funds and time) to accomplish goals and manage the program.					 An effective program includes enough time and funding to make changes in workplace safety and health conditions. In an inferior program, management does not allow workers time away from their normal duties for safety and health activities, and does not provide capital to invest in hazard controls.
Management assigns responsibility and accountability for implementing and maintaining the program.					 An effective program assigns responsibility to one person, or a few, based on the size of the company and the hazards present, and holds them accountable. An inferior program assigns responsibility to many people, such as all members of a large safety and health committee or "all workers." This ensures that no one takes personal ownership of the program.
Management encourages, recognizes, and rewards worker contributions to workplace safety and health.					 An effective program recognizes workers whose actions contribute to the goals of the program. An inferior program only recognizes workers who are not injured during a period of time.

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SECTION 2: WORKER PARTICIPATION

		Impl	ementation		
			Minor		
Action	None	Partial	Deficiencies	Full	Guidance
Workers are encouraged to participate in the program, have the means to participate, and feel comfortable participating and giving input on safety and health issues.					 An effective program is developed by a team or committee that includes workers. Management asks all workers to contribute, recognizes workers who participate, and shows them appreciation. An inferior program is developed by a small group of managers or the professional safety and health staff alone, and is not widely accepted.
Workers are trained on how to report an injury, illness, hazard, or concern, including good catches/near misses.					 In an effective program, workers know how to report injuries, incidents, and concerns and are encouraged to do so. The reporting system is easily accessible, and reports reach upper management. In an inferior program, workers are unclear about reporting procedures and typically rely on the first line supervisor to inform upper management.
Workers report injuries, illnesses, hazards, and concerns without fear of reprisal.					 In an effective program, management encourages, appreciates, and rewards worker reports because of the valuable information they provide. In an inferior program, management blames workers for injuries or takes actions that discourage reporting.
Reports of injuries, illnesses, hazards, or other concerns are acknowledged promptly.					 In an effective program, management acknowledges reports immediately and provides updates as an issue is addressed. In an inferior program, management does not acknowledge receiving reports and fails to inform workers when issues have been resolved.
Reports of injuries, illnesses, hazards, or other concerns are resolved promptly, after worker input is sought, and are tracked to completion.					 In an effective program, management shows the value it places on worker input by engaging them in finding and implementing solutions. Resolution is prompt and solutions are communicated to all. In an inferior program, workers play no role in finding solutions and are not informed of selected controls until after they have been implemented.
Workers have access to information they need to understand safety and health hazards and hazard control measures in the workplace.					 In an effective program, workers have access to injury and illness logs, incident investigations, Safety Data Sheets, job hazard analyses, industrial hygiene monitoring results, and other information indicative of hazards in the workplace. In an inferior program, workers see only information the employer is required to post by law.

		Impl	ementation		
			Minor		
Action	None	Partial	Deficiencies	Full	Guidance
Workers are assigned roles in or are otherwise involved in all aspects of the program.					 An effective program involves workers in all aspects of development, such as assessing training needs, investigating incidents, and evaluating the program. In an inferior program, safety and health staff or management make decisions about training, perform investigations and inspections without workers, or evaluate the program without worker input.
Workers can participate without encountering language, skill, or education barriers; restrictions on participating during work time; or fear of retaliation or discrimination.					 An effective program reflects diversity in education, language, and skill levels in the workplace. Workers feel comfortable participating during work time. An inferior program provides materials in a one-size-fits-all format. Workers are hesitant to speak up.
Workers have authority to initiate or request a temporary suspension or shutdown of any work activity or operation they believe to be unsafe.					 In an effective program, management empowers employees and contractors to use stop work authority when needed. In an inferior program, employees and contractors do not have, are not aware of, or are reluctant to exercise stop work authority.

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SECTION 3: HAZARD IDENTIFICATION AND ASSESSMENT

		Impl	ementation		
			Minor		
Action	None	Partial	Deficiencies	Full	Guidance
Written materials such as injury/illness logs, Safety Data Sheets, medical reports, workplace inspection results, incident investigation reports, and manufacturers' literature are reviewed to help identify hazards.					 In an effective program, management and workers review relevant data and materials, particularly injury reports and incident investigations, to ensure that known hazards are recognized. These reviews occur regularly (at least annually) and when there are significant changes). Sources of hazard information are monitored to maintain awareness of emerging hazards or new information. Management ensures that information is available to workers because they have unique insight into workplace hazards. An inferior program relies primarily on visual inspections of the workplace to reveal hazards.
The workplace is inspected regularly to identify conditions that pose or could pose a safety or health concern. Inspections cover all areas and activities and include plant and transportation vehicles.					 In an effective program, work areas regularly undergo formal inspections and work procedures are often informally observed. Inspections cover ancillary areas and activities of contractors, subcontractors, and temporary employees while onsite. An inferior program relies on an annual inspection to reveal hazards.
Before making changes to operations, workflow, physical plant, equipment, or materials, workers and managers conduct a review to identify any safety or health issues.					 An effective program uses a "change management" procedure that requires significant changes in processes, employees, or equipment to undergo a safety and health review before they are implemented. Workers participate in the review. In an inferior program, changes are made with minimal consideration given to safety and health and with no worker input.
The workplace is evaluated to identify worker exposure to health hazards.					 An effective program uses exposure monitoring (e.g., air sampling) to evaluate chemical, noise, or other health hazards and performs analysis on the results. Results at or above occupational exposure limits are addressed and where feasible, opportunities for further exposure reduction are examined. An inferior program recognizes health hazards only after workers show signs and symptoms of illness.
Trends in injury and illness data, reports of hazards, incidents, etc. are analyzed to identify common hazards.					 In an effective program, management reviews injury and illness records, incidents, and other safety and health records regularly (at least annually) to find common causes. In an inferior program, management uses injury and illness records for workers' compensation purposes only.

		Impl	ementation		
			Minor		
Action	None	Partial	Deficiencies	Full	Guidance
Incidents (including close calls/near misses) and employee complaints are investigated to identify any hazards previously unrecognized or inadequately controlled. Investigations focus on identifying the root cause(s) of each incident.					 In an effective program, management and workers investigate incidents to determine the root cause(s) and identify program/management/hazard control shortcomings that may have led to an incident. In an inferior program, management is satisfied with findings that workers did not follow procedures or the incident resulted from worker error or misconduct.
Hazards associated with emergencies and non-routine operations are identified in the emergency action plan and operating procedures, respectively. All identified hazards are characterized with respect to the severity of potential outcomes, likelihood of an event or exposure, and number of workers who might be exposed. This information is identified in operating procedures.					 An effective program uses scenario planning to predict the types of hazards that may arise during non-routine activities and emergencies. In an inferior program, management looks only for the hazards associated with routine operations. In an effective program, management and workers evaluate hazards using a systematic approach based on best available data. In an inferior program, management prioritizes hazards using an ad hoc approach, or does not prioritize them at all.
Interim controls are adopted while permanent controls are being determined.					 In an effective program, management and workers take immediate steps to reduce or minimize hazards. In an inferior program, management notes hazards but takes no measures to control them while identifying long-term solutions.
All serious and recognized hazards are addressed immediately, while prioritizing remaining hazards for further control.					 In an effective program, management and workers classify hazards and take prompt measures to control all serious and recognized hazards. In an inferior program, management treats all hazards the same and addresses them as funding becomes available.

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SECTION 4: HAZARD PREVENTION AND CONTROL

	Implementation				
			Minor		
Action	None	Partial	Deficiencies	Full	Guidance
Options for controlling hazards are identified using sources such as OSHA, NIOSH, industry best practices, and input from workers.					 In an effective program, management and workers seek guidance on effective control methods from authoritative sources (e.g., ANSI, ASME, NFPA, OSHA regs). In an inferior program, management relies on "shop-designed" control approaches that have not been shown to be effective.
Controls are selected according to the "hierarchy of controls," emphasizing (in order of priority) elimination, substitution, engineering controls, administrative controls, and PPE.					 An effective program uses primarily engineering controls or substitution to prevent or eliminate hazards. An inferior program relies on work procedures and PPE to reduce exposure to hazards.
A hazard control plan is used to plan and prioritize controls.					 An effective program creates and maintains a hazard control plan that tracks progress toward controlling hazards until completion, removes hazards from the plan when they are fully addressed, and adds new hazards as they are identified. An inferior program has no hazard control plan and reacts to hazards on an ad hoc basis. Management waits until the annual program evaluation to update the hazard control plan, if one exists.
Controls are installed as soon as a hazard is identified.					 An effective program controls hazards when they are identified and provides interim controls, such as work practices and PPE, for hazards that cannot be immediately reduced or eliminated with engineering controls. An inferior program ignores hazards or initiates work on a control, but does not track progress toward completion.
Interim controls are used when permanent controls cannot be immediately implemented.					 An effective program uses interim controls when needed, but also ensures that effective engineering controls are implemented as soon as possible, reducing the reliance on procedures, work practices, and PPE. An inferior program allows interim controls to be permanent.
Workers are involved in selecting controls.					 An effective program involves workers in choosing, designing, and implementing control methods to ensure that they are feasible and effective, and will be used properly. In an inferior program, management buys equipment and establishes procedures that often are ignored and unused because workers have no input.
Controls are in place to protect workers during emergencies and nonroutine operations.					 In an effective program, emergency response plans cover all foreseeable scenarios and contain clear instructions on what to do in each case. Plans identify roles and responsibilities. Equipment needed for response is available, maintained, and accessible. Plans are exercised and drill results are evaluated to identify needed improvements. In an inferior program, plans cover only fires and contain dated information. Plans are exercised infrequently.

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		Impler	mentation		
			Minor		
Action	None	Partial	Deficiencies	Full	Guidance
Once installed, controls are					An effective program assigns a person (or persons) to monitor control methods to
monitored to ensure that workers					ensure that they are implemented, maintained, operate as designed, and remain
understand their use and application					effective over time.
and to verify that they are effective.					An inferior program assumes that controls remain effective long after they are
					installed.
Implementation of controls is tracked					An effective program includes a system to track progress in controlling hazards, (to
to completion. Controls are inspected					ensure that hazard control is completed in a timely manner) and verifies that
and maintained.					controls remain effective over time.
					• In an inferior program, management verbally assigns responsibility to control a
					hazard but does not follow up to ensure that the work is completed or that the
					control is effective.

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SECTION 5: EDUCATION AND TRAINING

	Implementation				
			Minor		
Action	None	Partial	Deficiencies	Full	Guidance
Managers, supervisors, and workers understand the elements of the safety and health program and how to participate in it.					 In an effective program, workers are trained in all elements of program, with an emphasis on ways that they can be involved in both operating and continually improving it. In an inferior program, workers do not understand the elements of the program or how it is intended to operate.
Workers understand the employers' responsibilities under the program.					 An effective program empowers workers to recognize deficiencies, question management, and point out lapses in management's commitment. An inferior program does not encourage workers to question management's implementation of it.
Each worker understands his or her own role in the program.					 In an effective program, workers know how to interact with the program, how to be involved, and what is expected of them. In an inferior program, workers are unsure of the mechanisms for participation.
Workers know whom to contact with concerns or questions, and understand the procedures for reporting injuries, incidents, hazards, and concerns.					 In an effective program, workers are trained in the ways that they can report injuries, hazards, and concerns. In an inferior program, workers are directed to report only through their supervisors.
Workers know that they have a right to participate in the program and report injuries and illnesses without fear of retaliation or discrimination.					 An effective program gives workers a blame-free environment where they can report injuries, illnesses, hazards, and concerns without fear. An inferior program uses blame, retaliation, or misguided incentive programs to discourage reporting.
Workers with assigned roles under the program receive training in how to carry out their roles.					 In an effective program, workers expected to participate in inspections, incident investigations, or emergency response receive training for those duties. An inferior program assigns roles but gives minimal training or instruction.
Workers are trained to understand how to recognize hazards and effective techniques for their control.					 An effective program includes instruction on tools such as job hazard evaluations, and how to use them to identify hazards. An inferior program gives workers no role in controlling hazards, and thus no need for training.
Workers can ask questions, receive answers, and provide feedback during and after training.					 An effective program gives workers ample opportunity to receive clarification and additional information, as well as to provide feedback during and after training. An inferior program gives workers information, but not encouragement to ask questions and give feedback.

		Impler	mentation		
			Minor		
Action	None	Partial	Deficiencies	Full	Guidance
Employers, managers, and supervisors understand their responsibilities under the OSH Act; procedures for responding to workers' reports of injury, illness, or concern; techniques for identifying and controlling hazards; and fundamentals of incident investigation.					 In an effective program, managers and supervisors receive core safety and health competency training. An inferior program relies on a single person with no formal training for all safety and health-related expertise.
Workers receive supplemental training when a change in the workplace could introduce new or increased hazards. Workers receive training in a language and at a literacy level that					 An effective program trains workers about hazards related to new equipment or procedures and how to use them safely. In an inferior program, management installs new equipment and implements new procedures without informing workers about safety and health concerns. Workers are expected to learn about the hazards of a new assignment "on the job." An effective program trains workers in languages spoken in the workplace and at appropriate literacy levels.
all of them can understand.					 An inferior program provides "one-size-fits-all" training and does not account for differences in language or literacy.

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SECTION 6: PROGRAM EVALUATION AND IMPROVEMENT

		Impler	mentation		
			Minor		
Requirement	None	Partial	Deficiencies	Full	Guidance
Performance indicators are used to track progress toward program goals.					 An effective program identifies key indicators of progress toward goals. Indicators are measurable and quantifiable. An inferior program tracks only what is required by law.
Performance is tracked using both lagging and leading indicators.					 An effective program monitors indicators of program implementation, program participation, and program maturity. An inferior program monitors only the incidence of workplace injuries and illnesses.
Performance data are analyzed and shared with workers.					 An effective program features regular updates on performance, with workers involved in evaluating progress. An inferior program shares performance data only with managers.
Management does an initial review (and subsequent annual reviews) to evaluate the program and ensure that it is fully implemented and functioning as planned.					 An effective program is evaluated at least annually to determine if goals are being met, shortcomings are identified, and performance is continually improving. In an inferior program, management assumes no improvement is needed after implementation. The program's goals stay the same year after year.
Workers are involved in all program review activities.					 An effective program establishes a program evaluation team, with workers from all levels, to get the best possible perspective on how it is operating and how it can be improved. An inferior program assigns program evaluation to a manager or the professional safety and health staff, with little or no input from workers.
Program reviews examine key processes to ensure that they are operating as intended.					 In an effective program, evaluations examine whether and how key processes are being used, such as injury/illness/incident reporting, inspections, hazard control, and performance monitoring. In an ineffective program, evaluations focus mainly on progress toward goals.
The program is modified as needed to correct shortcomings.					 An effective program is modified as soon as deficiencies are detected or opportunities to improve arise. Controls for identified deficiencies are tracked to completion. An inferior program is expected to operate effectively once implemented, without need for modification.

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SECTION 7: COMMUNICATION AND COORDINATION FOR HOST EMPLOYERS, CONTRACTORS, AND STAFFING AGENCIES

		Impler	mentation		
			Minor		
Action	None	Partial	Deficiencies	Full	Guidance
Before contractors or staffing agencies bring their workers onsite, they and the host employers determine which among them will implement the various elements of the safety and health program.					 In an effective program, host employers and contractors/staffing agencies meet to review each other's safety and health program and determine which actions each will take. Decisions are documented in the form of an agreement, letter of intent, memorandum of understanding, or contract documents. In an ineffective program, host employers have no communication with contractors and staffing agencies about safety and health before they come onsite. Lack of communication leads to omissions or conflicts that result in unsafe conditions.
Before contractors or staffing agencies bring their workers onsite, host employers give them enough information to assess hazards those workers may encounter, to understand the measures taken to control them (e.g., safety and health rules, when PPE is required, whom to contact in an emergency, etc.), and to avoid creating hazards that affect workers on the site.					 An effective program gives contractors, staffing agencies, and their workers access to information about hazards at the worksite and measures taken to control them (including, but not limited to, site safety and health rules, when personal protective equipment is required, whom to contact in an emergency, etc.). Contractors and staffing agencies adjust work practices and implement any additional controls needed to avoid creating new hazards while onsite. In an inferior program, contractors and staffing agencies learn of hazards only as they encounter them during their work.
Contractors and staffing agencies inform the host employer about injuries, illnesses, hazards, or concerns reported by their employees, and the results of any tracking or trend analysis that they perform.					 In an effective program, contractors and staffing agencies promptly communicate with the host employer when their employees report an injury, illness, hazard, or concern, or they receive the results of any tracking or trend analysis. In an inferior program, information on injuries, illnesses, hazards, or concerns among contractor or staffing agency employees is not shared with the host employer.
Contractors and staffing agencies inform the host employer of any hazards arising from their work onsite and the controls in place to address those hazards.					 In an effective program, before arriving at the site, contractors and staffing agencies inform the host employer and other employers at the site about the hazards inherent in their work and measures they will take to control them. An inferior program allows staff and contractor personnel to work in the same area without sharing information about hazards.

	Implementation				
			Minor		
Action	None	Partial	Deficiencies	Full	Guidance
Before contractors or staffing agencies bring their workers onsite, the host employer gives them the opportunity to conduct site visits or inspections and to review injury and illness records and other safety and health information.					 An effective program informs contractors and staffing agencies and their workers of hazards they will encounter, as well as site safety and health rules, hazard controls, and procedures. It does so by including contractor personnel and staffing agency workers in general safety and health awareness training and allowing them to participate in site inspections before they begin work. An inferior program allows contractor personnel and staffing agency workers to discover hazards on the job.
Host employers communicate with contractors and staffing agencies and their workers about non-routine and emergency hazards and emergency procedures.					 An effective program provides information and training to contractor personnel about emergency procedures before they start work. An inferior program does not anticipate that emergencies may affect contractor personnel.
Host employers include any safety- related specifications or qualifications in bid documents and contracts.					 In an effective program, host employers establish safety and health performance requirements and expectations in bid documents and contracts. Contractor and staffing agency qualifications and responses to performance requirements are considered during the selection process. In an inferior program, safety and health is not addressed during the selection of contractors or staffing agencies.
Host employers coordinate with contractors and staffing agencies to ensure that work is planned and scheduled to minimize impacts on safety and health.					 In an effective program, host employers, contractors, and staffing agencies coordinate on work planning, scheduling, and resolving program differences to identify and work out any concerns or conflicts that could affect safety or health. In an inferior program, scheduling issues and conflicts are not resolved until they occur.
Staffing agency workers are adequately trained and equipped before arriving onsite.					 In an effective program, host employers communicate any requirements for temporary worker training or equipment to staffing agencies before workers arrive onsite. Staffing agencies have enough lead time to properly train and equip their workers. In an inferior program, temporary workers arrive at the worksite and begin work without having received training and without proper equipment.
Host employer, contractor, and staffing agency policies and procedures are aligned to ensure that all workers receive consistent safety and health information.					 In an effective program, host employers, contractors, and staffing agencies review each other's safety and health policies and procedures before work begins and resolve any discrepancies. All workers onsite receive consistent safety and health information and messaging. In an inferior program, workers are confronted with inconsistent or conflicting information about safety and health issues, leading to confusion or lack of focus.

	Implementation				
			Minor		
Action	None	Partial	Deficiencies	Full	Guidance
Workers have access to managers with decision-making authority, to resolve any coordination issues or discrepancies.					 In an effective program, all workers onsite can identify and have access to someone responsible for resolving safety and health issues between host employers, contractors, and staffing agencies. In an inferior program, workers are unsure whom to contact, or do not have access to the person expected to resolve safety and health issues.

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