



Bulletin No. SF1
File: Safety

Bulletin

Company Safety Programs

Introduction

Worker safety and health in the mechanical industry has become a top priority for mechanical contractors for a number of reasons, including:

- our moral obligation to protect workers;
- increasing contractor liability;
- increasing workers compensation costs;
- increases in other accident related costs; and
- the growing demand by construction owners, general contractors, construction managers, etc., that contractors establish and implement comprehensive safety and health programs.

The information in this bulletin is drawn from MCAA's *Model Safety and Loss Prevention Program*, the best publication available for mechanical construction contractors who are planning to develop company safety programs or revise existing programs. It helps the user build a program that focuses on preventing the most common injuries and other dollar losses in the mechanical industry. The publication is as valuable to contractors whose companies are not large enough to support a full-time safety professional

as it is to contractors whose companies have retained full-time safety personnel. We recommend that you refer to this publication for a more detailed look at the development of a company safety program.

Basic Components of a Company Safety Program

All company safety programs should be tailored to the specific needs of each individual company. However, there are ten basic components that should be covered in every company safety program.

1. Corporate Safety Policy

A corporate safety policy prescribes a course of action to reduce the number of work-related injuries that occur within a company. The policy should state the company's intentions regarding worker protection and establish the criteria to be used to measure its overall safety performance. The statement should also address the worker's role in reducing the number of job site injuries and illnesses. Each worker should be provided with a copy of the policy statement and encouraged to read it carefully.

2. Corporate Commitment

Successful company safety and health programs must have complete commitment from the chief executive

officer (CEO) all the way down to the workers in the field. To get commitment from managers and workers, the CEO must demonstrate his or her personal commitment to worker safety and health. Suggested ways to demonstrate total commitment are:

- The CEO should write a corporate commitment letter and provide a copy to each manager/supervisor and worker by including it in the written company safety program.
- The CEO should take every opportunity to personally express to the company's employees his or her belief that worker safety and health is the company's top priority.
- At every company meeting, safety and health should be the first topic of discussion.
- In smaller companies, the CEO should participate in new worker safety orientation training sessions by describing the company's commitment to providing workers with a safe and healthy work environment. This is also a good time to make it clear that the workers play a major role in helping the company achieve its safety goals. The CEO should take the time to describe the company's safety incentive program and disciplinary action program. In larger companies, a senior supervisor or safety director should deliver the same message.
- The CEO should publicly recognize each worker who earns a safety incentive award and should present awards at a well-attended company meeting.
- The CEO should start every large-scale company safety meeting with a brief report on the company's safety performance.

3. Worker Training Requirements

Safety and health training provides workers with the information they need to protect themselves from job site hazards. Safety and health training is a major key to keeping workers safe on the job site. To be effective, training must be:

- Relatively short in duration;
- Conducted during regular working hours;
- Specific to the workers' industry; and
- As appealing as possible.

Training should include at a minimum:

- New worker safety orientation;
- Weekly toolbox safety talks; and
- Task specific training as required by OSHA.

4. Disciplinary Action

A disciplinary action policy is an established course of action to be taken when workers fail to comply with safe work rules and other company policies. The policy is important because it:

- Sends a message to the workers that unsafe acts will not be tolerated;
- Provides employers with a defense against discrimination claims in situations where workers must be discharged for committing unsafe acts;
- Gives employers an affirmative defense against OSHA citations and fines in many situations.

5. Safety Incentives

A safety incentive program has proven to be an effective management tool to heighten and maintain the awareness of workers with regard to job site safety and health. Safety incentives:

- Help workers stay aware of safety and health issues;
- Make workers more likely to spot safety and health hazards;
- Make workers more likely to address the safety and health hazards they observe;
- Make workers more likely to watch out for the safety and health of co-workers; and
- Help reduce the incidence of fraudulent injury/illness claims.

6. Substance Abuse and Drug Testing

Controlling substance abuse in the work place is another key to preventing workplace injuries. Workers who are under the influence of alcohol and/or drugs:

- Experience changes in the way they ordinarily think or approach problems;
- Find it difficult to concentrate;
- Lose their ability to make good judgments;
- Experience much slower reflexes;
- Lose depth perception; and
- Are four times more likely to be involved in a workplace accident.

7. Work Site Hazard Analysis

Before starting a new job the work area should be analyzed to determine:

- Whether one or more hazards already exists; or
- Whether hazards will be created by work to be performed.

An example of an existing hazard would be lack of oxygen in a confined space that must be entered by a worker. A work site hazard analysis would determine the need for air sampling and other safe confined space entry procedures so they can be planned accordingly.

An example of a hazard created by the work would be hot work in an area where combustible materials are stored. Performing hot work in the area creates a hazard. Without the hot work there is no hazard. A work site hazard analysis would determine the need to remove the combustible materials or isolate them from the heat, sparks and slag before work begins.

Implementing work site hazard analysis as a regular part of your safety program is not difficult to do. Most experienced supervisors and workers already do it to some degree without even thinking about it.

8. Accident/Incident Investigation

Management conducts the investigation of accidents and incidents that do not result in worker injury so that procedures or work rules can be established to prevent their recurrence. Thorough investigations help to determine the cause and identify factors that lead to the accident/incident. More than one supervisor should conduct the investigation.

9. Modified Duty

A modified duty policy is designed to bring workers who are receiving workers' compensation benefits back to work as soon as possible. Workers who are physically unable to perform their regular work tasks can usually perform less strenuous work tasks. For example, a worker with a low back muscle strain could inventory materials or answer telephones in a trailer or office.

By getting workers back to work as soon as possible, companies save a fortune in workers' compensation expenditures. It costs much less for companies to bring workers back on modified duty with full pay and benefits than it does to

allow them to stay home collecting workers' compensation benefits.

10. Recordkeeping

The Occupational Safety and Health Administration (OSHA) requires employers to keep records of occupational illnesses and injuries. In some situations, employers must also report them to OSHA.

In addition to MCAA's *Model Safety and Loss Prevention Program*, MCAA has many new, user-friendly safety and health resources written or produced specifically for the mechanical industry. For information on these resources or any safety topics or issues call MCAA at 301-869-5800.