SAFETY SOLUTIONS

SAFETY POLICY DEVELOPMENT

Once you have identified job-site hazards, a safety policy must be developed to protect your people from those hazards. A safety policy does not have to be a voluminous compendium that covers every minute detail of your operations. A simple, concise, effectively written safety policy will provide your people with a tool to help keep them safe at a job site. However, the policy should be flexible so it can be adapted to include hazards that were unforeseen when it was published.

The first consideration in writing a safety policy is to define responsibilities so there can be ACCOUNTABILITY. Without accountability, the safety culture you're trying to grow in your organization will have no cohesion. For example, if it is a Superintendent's responsibility to conduct a job-hazard analysis and it wasn't done, the Manager knows where to turn to apply the next aspect of a safety policy: DISCIPLINE.

Discipline is an absolute necessity in a safety policy. If an employee is clearly instructed on how to accomplish a task safely but does not follow instructions, he or she must be reminded that there are repercussions for not adhering to the policy. The discipline itself can include any number of actions, from a demerit structure to an automatic suspension, with the possibility of termination for more serious or repeated infractions. Whether it's a fine, a lost day's pay, a reduced bonus, or being excluded from an award for good performance, the discipline has to mean something.

Documenting discipline is also essential to any safety policy. While the ultimate goal of a safety policy is to protect workers, it is also a means of protecting a company in the event of an accident. After a fatality, OSHA will conduct an investigation, and it must be clearly demonstrated that the company has a firm safety policy in place with examples of disciplinary action for infractions to avoid potential fines and other possible litigation.

The most important part of the safety policy is the body of the document. It is this part of the policy that actually defines everything from methods of protection to identified and predictable hazards. There are a number of prewritten resources available for the body of the policy, including the following:

1. OSHA—29CFR1910 and 29CFR1926 are federal regulations that govern general industry and the construction industry. If a company solely used these two sources of information, it would be compliant with federal regulations. Depending on the state in which a company operates, a "State Plan" compliance organization may also exist. State Plans at a minimum are equal to federal regulations but, in many cases, may exceed federal regulations.

2. ANSI/ASME—The American National Standards Institute and the American Society of Mechanical Engineers are both national organizations that have compiled a broad spectrum of *consensus* safety regulations. ANSI and ASME update their standards far more frequently than OSHA and may be more current with regard to the latest safety issues.

3. EM385-1-1—The Army Corps of Engineers Engineering Manual 385-1-1 contains regulations that apply to a number of federal jurisdictions. Typically, any military institution, whether it is a military base or a single structure owned by a branch of the U.S. military, is under the jurisdiction of the Army Corps of Engineers; in many cases, its safety standards exceed those of OSHA. Like ANSI/ASME, the EM385 is updated more frequently than OSHA regulations. The most recent revision was published in 2008; however, a 2012 revision is currently slated for publication in the fall of 2013, according to the Army Corps of Engineers' website.

4. Trade associations, such as the International Concrete Repair Institute (ICRI), publish safety guides that are user-friendly and industry-specific. ICRI Technical Guideline No. 120.1-2009 was written by leaders in the industry who deal with the specific hazards concrete repair contractors deal with on a regular basis.

5. Manufacturers of tools, equipment, and construction materials usually have instructional manuals or a series of warning labels that accompany their products. In the case of materials, Material Safety Data Sheets (MSDSs) or Safety Data Sheets (SDSs) are required to accompany the initial shipment of a product to a customer-specified destination. Instructional manuals and MSDSs are excellent sources of safety information.

In writing your safety policy, include the highlights of each section. Emphasize the areas that could lead to fatalities and serious injury. Keep it simple and try not to combine every source of information into one place. A safety policy with too much content may be too much to absorb and the intended effect may be lost. In addition, ongoing safety meetings that focus on specific aspects of the safety policy should be conducted and may be more effective in gaining compliance with the policy.

The final part of a safety policy is the Appendix. This isn't necessarily a required component of a safety policy; however, it is a good location to compile many of the forms and schematics to which your policy refers. You may want to include accident report forms and inspection forms for scaffolds, rigging, excavations, and equipment, as well as schematic drawings of various sloping and benching methods for excavating soil or any other reference information.

Some companies feel the need to create large, voluminous policies to cover every minute detail and possibility an employee may encounter in the field. The problem with that is the environment in which we work changes faster than a policy can, especially in the repair industry. We uncover conditions and details in the course of our work for which we can never fully plan. Your objective should be to write a lean, nimble safety policy that allows your well-trained people to adapt to the situations they encounter at a job site.

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