SMALL BUSINESS SAFETY PROGRAMS WITHOUT A DEDICATED SAFETY MANAGER

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Small Business Safety Programs without a Dedicated Safety Manager

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How do you, as a small business owner, implement an effective safety program when you don't have a dedicated safety professional on staff?

You know that the safety of your employees is important. You know that insurance premiums (workman's comp or general liability), which are already high, can move out of reasonable financial range with even a minor claim. You may have heard of some of your business colleagues being ineligible to bid work with certain general contractors because of poor work safety histories. The final challenge, of course (and potentially the main reason that you are reading this article) is because a full-time, or even a part-time, dedicated safety manager is simply not in your budget. What can you do?

The following ideas and thoughts are presented to give you some idea of how to set up a working safety program without a dedicated full or part-time safety person.

How to Manage a Successful Safety Program in any Organization

There are two basic elements to any safety program: management, and knowledge of good safety regulations and practices. Let's start with the management element first, and then we will weave the safety regulations and practices into the picture later in this article.

First of all, I presume that you are the boss, owner, or president of your organization – the big kahuna. Nothing happens in your business without your say-so. Let's assume that you have between 10 to 50 employees (this figure is arbitrarily chosen for this article; there is no real limit or threshold number of employees).

In a company this size, and even in much smaller companies, there is no way you can do everything yourself. In order to get many things done and run a successful company, you must be able and willing to delegate tasks and responsibilities to your employees: delivering equipment to a project site, equipment operation, timekeeping and payroll, office administration, etc. This same concept applies for safety, but with certain differences.

Unlike accounting, where you have a specific individual assigned to the task of accounting for your company, consider that you will have many people in charge of safety—namely, your employees. *All of your employees.* You can leverage your supervisors and crews into handling safety in the field, and why not? After all, safety starts and ends with your crews—regardless of whether you have a dedicated safety person on-site—so you might as well leverage their experience and knowledge for field safety. This will be accomplished, in part, through training them to be responsible for their own safety, the safety of their coworkers, and recognizing and correcting safe (and unsafe) conditions and behaviors on a job site.

An Example of How to Build a Safety Program Without a Dedicated Safety Person

Let me offer the following story, which I experienced several years ago, to illustrate how leveraging your employees can help you sustain a safety program without a dedicated safety professional. I was responsible for the safety of four company locations in three different states. When hired, I inherited a single safety manager at only one of the sites, and he left shortly after I started, meaning I was responsible for approximately 250 employees across four locations.

While I began the process of seeking safety managers for each site, I was the sole safety person for the first seven months in that role. During that period, I realized that I could not, by myself, sufficiently maintain the safety programs of all the locations. Instead of focusing on hiring several people to support me in my efforts, I began to focus my attention on safety training.

The first step was getting everyone – all managers and crews – to attend my training sessions. Next, I commenced doing field safety audits at each site, and importantly, I made sure to bring the managers/crewmen with me. I used this time as a tool to train the folks on what to look for from a safety perspective. From there, I implemented a system where unsafe conditions would be reported to management, so they could be promptly fixed. Included in this process, was feedback to the crews regarding the repair status of the unsafe conditions that were identified. This provided transparency among management and crew regarding what was unsafe, and whether or not the issue had been resolved. Finally, I actively promoted, with management's active participation, that crews would provide safety feedback. Employees have good ideas, so I did my best to encourage their feedback and input.

In short, crews were trained and shown what unsafe conditions looked like, what safety conditions should look like, and crews were included in management safety operations and safety programs/practices, which gave them a platform to identify unsafe working conditions so they could quickly be remedied. Suddenly, the burden on me was greatly reduced with only a slight increase in management time.

Final notes on this story

An interesting side-effect of the new safety program that was implemented was equipment breakdowns and production slowdowns were reduced. This occurred because, while doing their safety inspections, crews also happened to identify and report failing equipment conditions using the process that was set up for safety. Also, several of the above "brilliant" ideas came from crews and management after I explained the dilemma (too many locations/employees and not enough safety guys). After a short period of time, we all figured out how to make safety work without a full-time safety person onsite.

The end result was fewer unsafe conditions at work, fewer injuries, reduced equipment down time, and the luxury of having an effective safety program without a dedicated safety manager at each location.

What does such a system look like in practice?

1. Everyone is a safety person.
2. Everyone is responsible and accountable for safety.
3. The employer must provide safety training so that project supervisors, lead men, and crewmen know what sound safety practices are.
4. The owner/president of the company, along with several others in the company, will help to oversee safety (accountability aspect).
5. Safety starts with everyone in the company (project managers, crewmen, the president, accounting, HR—everyone).

What paperwork is needed for a successful safety program

Before continuing, let's take a quick sidestep here to identify what the paperwork element of a safety program may consist of:

1. **Safety manual** – This does not have to be long. Topics should be relevant to the specific activities that your business undertakes. The language should be clear and simply convey to employees what they need do, and how they need to do it with safety precautions attached to each item – no need for lofty safety theory here. Keep it simple and straightforward. Don't bother referring to OSHA regulations by number, such as 29 CFR 1910.178. We want this to be simple, clear, and concise.
2. **Safety training** – This includes daily/weekly safety talks (signed by crews and dated) and Job Safety/Hazard Analysis (JHA/JSA). With the help of your employees, generate a list of safety topics for training. You can use OSHA (or MSHA) materials for training. Keep track of who had what kind of training, and when, to ensure that everyone is properly trained. Note: Keep safety paperwork to a minimum. For example, weekly safety talks, JHAs/JSAs, incident reports, and field safety audits constitute a good minimum. You can always add more later if desired and/or necessary.
3. **Field safety audits** – You and your direct reports, when on site, should take a few minutes to jot down notes on some observations of positive points that maintain safety for everyone, as well as any areas in need of improvement.
4. **Record keeping** – OSHA Forms 300 and 300A need be maintained. These forms are simple to use, and this task is made easier if all injury information is kept in a single file for each year.

Professional Observation

During the years that I worked as a safety manager for various companies, I arrived at several conclusions after investigating incidents for over a dozen years. First, employees, both individually and collectively, know how to handle a task safely. Second, almost 85% of people whom I interviewed in post-incident investigations told me, "I thought about doing it the right way, but just didn't." In short, most folks in the field know what is safe, yet forget, or for some other reason, choose not to follow safety procedures. Safety training therefore serves two purposes: it reminds employees of the proper safety practices, and it sends the message that the company cares about keeping its employees safe.

6 Steps For Creating Your Own Safety Program

1. Lead by Example

First and foremost, lead by example. As the owner/president of your company, everyone looks to you for guidance, instruction, approval, and corrections when it comes to task handling and execution. Everyone follows your lead—including in the area of safety. If you do not actively promote and observe safety practices, correct unsafe behaviors and/or conditions in the field, and support your subordinates in safety matters, no one will pay attention to safety.

The phrase "lead by example" carries a lot of weight. Your subordinates follow the leader, and instruction comes in several forms: written, verbal, and actions. If you expect crews to follow safety rules, then you need to make sure that you follow them yourself. The same thing goes for all of the

personnel in your company. If anyone in the chain of command is not adhering to the company's safety protocols, then they are setting a bad example for the people that work under them.

For example, if you have a rule that requires the use of fall protection equipment on leading edges higher than X feet, but you yourself go hopping and skipping along a leading edge without fall protection, then you just told your crew that safety rules only "sometimes" apply. This practice applies to all field personnel—be it an owner, supervisor, lead man, etc. Everyone must follow the safety rules. No exceptions. Gravity does not respect job titles.

2. Have an Objective

Second, have an objective in mind regarding how you want to bring your employees into the safety practices of your company. Create a framework that designates the roles that each employee classification (supervisors, lead men, and crews) will play in this endeavor.

Below is an example framework, which helps provide clarity around the responsibilities of each employee group:

- **Owner/president** will correct unsafe conditions/behaviors in the field by:
    - Offering guidance to all direct reports on safety.
    - Answering direct report safety questions or referring them to an appropriate safety resource (see below).
    - Overseeing/reviewing safety paperwork such as weekly safety talks, training schedules, etc.
        - It is perfectly acceptable for this person to have someone report to him directly to give updates on any of the above paperwork.
    - Supporting direct reports on safety correction issues, discipline, etc.
    - Giving shape to the safety program, determining how it works, and defining each employee's role to the program.
    - Ensuring that all personnel are accountable for their specific assigned safety duties.
        - Only the president has the authority to make employees perform certain tasks and/or to back up one of his direct reports. There are stubborn employees, and occasionally those people will need to be addressed.
    - Sharing information among crews.
        - A safety suggestion arising from one crewmember may be applicable to others as well. Share suggestion(s) and encourage sharing.
    - Considering the formation of a safety committee.
    - Supporting an employee's exercise of Stop Work Authority (SWA) – See note below.

- **Direct reports/superintendents**:
    - Will give guidance to all direct reports/crews on safety.
    - Will answer direct report's/crew's safety questions.
    - Will make sure that safety paperwork—i.e. weekly safety talks, training schedules, etc.—are available for crews to use, reference, and fill out. Make it easy: pass out weekly safety talk/JHA-JSA forms to all. Also, make sure that all such paperwork is

completed in a timely manner and properly turned in. A signed weekly safety talk has no value if it is sitting under the seat of a truck; it must be turned in.
    - Ensure accountability of their crews/direct reports of doing/undertaking all assigned safety tasks. (This includes weekly safety talks, making sure that the appropriate crewmen attend safety training courses, conducting themselves safely in the field, and ensuring that all such forms are turned in on time.)
    - Provide president/owner with feedback on safety issues in the field, and offering corrective solution suggestions.
    - Ensure that crews are following the program's safety policies and practices.
    - Provide weekly/biweekly/monthly reports on the project status, including safety successes and areas in need of improvement. Must keep the president informed.
    - Conduct incident investigations for any equipment damage/worker injury.
    - Offer suggestions as to how to change/improve/modify the safety program to best suit overall company safety goals.
    - Support an employee's exercise of stop work authority.
    - Answer crewmember and employee question(s) regarding safety.
    - If you see something unsafe, say something. If someone points out an unsafe act or behavior that you are personally exhibiting, thank them.
    - Be approachable. You want crewmen to feel comfortable asking questions, correcting safety concerns, etc.

- **All other employees:**

    - Follow safety rules/practices.
    - Follow safety directions as given.
    - If you have questions about safety (whether your personal safety or the safety of your fellow employees and supervisors), then you should always ask.
    - Make observations of unsafe behaviors/conditions known to supervisors immediately.
    - If an observed unsafe condition/behavior can be safely and properly corrected by employee, then do so.
    - Exercise stop work authority. If an unsafe condition/behavior exists, then stop work long enough to correct the problem and/or promptly notify a supervisor.
    - If you see something unsafe, say something. If someone points out an unsafe act or behavior that you are personally exhibiting, thank them.

Once you have made your own outline using the above considerations (plus your own thoughts) with your direct reports, consider modifying your initial thoughts to include your direct reports' suggestions, and then arrange a short meeting with all company personnel to introduce and explain your program.

Post this plan so that everyone can see it. Update the safety plan periodically as useable suggestions/input from crews are added. Each quarter, consider holding a quick meeting with your direct reports for updates, suggestions, and input regarding the safety program. This keeps the safety ball moving and reinforces the importance of safety in the minds of your employees.

Quick Note on Stop Work Authority (SWA)

Years ago, when I first suggested Stop Work Authority to one of my bosses, he had an unexpected reaction. He stopped talking, turned red in the face, started sputtering, and I thought that he was going to explode right in front of me. Finally, he managed to get out, "Absolutely not!"

In reality, when exercised, stop work authority simply means that an employee may stop doing his/her job for the few minutes it takes to correct an unsafe condition. For example, an employee jackhammering concrete was not wearing his face shield as required. His task was stopped for the minute or two that it took him to go retrieve and put on his face shield before returning to his task.

In a recent case that I handled as a safety expert witness, an employee did not use his stop work authority. As a result, it cost the company several hundred hours of post-accident investigation, litigation, and depositions of company employees at the employer's expense. A couple of minutes taken for the SWA could have saved hundreds of hours that were tied up in litigation, a considerable amount of money, and the loss of the long-term employee's services.

3. Identify and Distribute Safety Knowledge

Third, identify and distribute sources of safety knowledge and make sure that both you, and your field supervisors, are using them properly.

Examples of safety knowledge include:

- OSHA Website
  - www.osha.gov
- OSHA Publication 2254
  - www.osha.gov/Publications/osha2254.pdf
- American Society of Safety Professionals
  - www.asse.org

After distributing these safety materials to your direct reports, it's important that you make sure these materials are actually being reviewed and implemented. A good way to go about this is to give the OSHA Publication 2254 (or other safety document) to each direct report, and then have them identify the safety topics that are applicable to your business – this helps hold them accountable for reviewing these materials.

Next, conduct a short meeting to review the topics that each direct report has identified, and assign each person other topics that they should become familiar with. From here on, these direct reports now become the teachers. On a regular basis, you should conduct 15-30-minute teaching sessions to review and discuss pertinent topics. For longer topics, it may be a good idea to have two people divide the teaching responsibility. This training will be more formal for the crews—say, in the office—and should last 30 minutes. Provide some food/coffee/beverages when doing this training. Brains and attitudes are greatly influenced by the stomach. Offer this level of training on a monthly basis, or every two months.

Either you or your direct reports can find toolbox safely talks and JSA/JHA forms on the OSHA website. These resources can be downloaded, printed, and used in your business.

Also, be sure to explain to your direct reports that they can call OSHA if they have any questions about the materials they are reading. Of course, there are also plenty of good safety resources on the internet, but I personally suggest sticking with OSHA materials.

4. The Program Steps

The program steps are where each person's role is made known to all employees. Be prepared to modify these as employee participation develops, as you may find some folks are better or more interested in some aspects than others – let them run with the ball.

As the leader, you are responsible for setting up, arranging, and overseeing the safety program. You will provide the framework and rough outline of responsibility delegation, but be sure to seek input from company personnel.

Here are some suggested steps:

1. Write out your objectives of who will have what responsibilities. This does not have to be long – a single page is a good starting point. Hold a meeting with your top direct reports and discuss to get their suggestions.

2. In this initial writing, identify the hazards for tasks commonly faced by crews. For example: climbing ladders, working in trenches, entering sewers, working on equipment, etc. I suggest that you ask your crews for input on this list of hazards. They may see hazards that you have overlooked. Get their input and add it to the list if reasonable.

3. Safety training resources. Explain how safety training works. For example, explain that you will, at least initially, provide some toolbox safety talks. OSHA is a great resource. You may find that ASSP (formerly known known as ASSE) puts out a publication called Professional Safety or Safety + Health from the National Safety Council, which also produces nice, short articles that explain safety issues on a variety of topics.

4. Actual safety training. There are two levels of safety training. The first level is formal classroom training. This type of training may be provided by an outside safety trainer. Outside trainers may be more suitable for certain topics (such as trench or confined space safety training).

   The second level of safety training takes place daily/weekly in the field—namely toolbox safety talks. Delegate the responsibility of daily/weekly safety toolbox safety talks to your crew leads. Encourage crews to discuss the topic presented rather than just listening to the trainers talk. This takes only a few extra minutes. Safety training includes pre-shift discussions of the day's task while using a JSA/JHA, or this can be included in the toolbox safety talk. The lead man explains the tasks that need to be done that day and by whom, and this is a great time to point out potential hazards and methods of avoiding those hazards. Explain to your crews that this is a good time for them to bring up any other hazards that were not mentioned by the lead man.

5. Assign crew responsibility for presenting the daily safety talk, filling out the JSA, and obtaining the signatures of those who attended the safety talk and returning such documents to you on a daily or weekly basis.
    a. Note: getting the paperwork back to you is a critical step in the safety world, but a very simple one. Employees can, with some prompting, learn to keep these papers and turn them in when they come in for paychecks. You might consider giving each lead man a plastic folder to hold the safety talks.

6. Explain that safety is everyone's job. Safety, just like doing the job in a workmanlike manner, is part of their job description.

7. Explain that if they see anything unsafe (condition or behavior) on site, they can correct it. No matter who is being unsafe, any crewman can point it out.

5. Designate Roles

Fifth, designate roles that people/classes of employees will play in the self-directed safety program. It is logical to task specific individuals to specific roles in your new safety program, but be flexible. The goals/objectives are fixed, but the manner in which you attain those goals is flexible.

For example, consider explaining that your direct report/lead man will pick up that week's safety talks/JHA-JSA on each Monday. These same people will collect signatures from the crewmembers at the end of each safety talk and return those signed papers at the end of the week when they come in for paychecks. The person who gives the daily safety talks is flexible (ask crewman to give the safety talks, and you can rotate among through crewmembers), as is the selection of topics. The manner in which those safety talks are presented is flexible as well.

Recognize when a particular crewman has an interest in a specific safety issue and wants to present that topic as one of the daily safety topics. Note: safety topics should be related to tasks that are commonly undertaken. If your business does not put people on ladders, then safety talks on ladders would be irrelevant to the crew, and they may start losing interest in your safety program.

You will also want to explain that it is the responsibility of all employees to point out unsafe conditions and behaviors, to stop work to correct unsafe conditions, and to share any suggestions that they may have on anything related to safety.

6. Feedback

Feedback from employees is an important part of any successful safety program. Your employees should be active in the safety program and the policies/practices that you implement. Be sure to explain that you need, and expect, feedback from all personnel (direct reports, lead men, etc.) on the safety program as it unfolds and is implemented.

This feedback will usually consist of suggestions for improvement. Listen to all comments/suggestions. Your crews are smart and knowledgeable about their work, and they want to share their knowledge with you. Listen to and adopt any good ideas that you receive, but note that not all ideas make sense or are appropriate. Regardless of the suitability of suggestions, always be courteous, because even a

person who makes an inapplicable suggestion may offer a useful suggestion later. You always want to encourage suggestions from your employees.

If you receive a suggestion that will not work, explain why. Use ideas received as a teaching opportunity for your crews. For example, I did some training on the reasons why pulleys on machinery needed to be guarded. An employee grabbed me shortly after that training session and showed me an unguarded pulley, but the pulley was located 15 feet above where anyone could reach it. I took a minute to thank him for pointing out the unguarded pulley, and I explained that pulleys in locations where humans can't contact them do not need to be guarded. Hopefully I handled the employee's observation in such an encouraging manner that, should he see another potential safety issue in the future, he will feel comfortable enough to take the time and point it out to me. Unsafe conditions must always be corrected before an incident occurs; therefore, anyone pointing out something that they think is unsafe is always greatly appreciated.

Managing Your Safety Program

Finally, how will you—as the company owner—manage your safety program, and how will your safety program look and work. This depends on the framework that you initiate, as well as how you allow the program to evolve over time. Lead by example. Everyone will follow your lead, so make sure that your lead is well-founded on solid safety principles. If you follow the safety rules, then most of your employees will, too. If you support the safety program and the efforts of your direct reports and crewmembers, you will have a good safety foundation. The program will likely evolve from your initial starting point, but that is the nature of a well-run safety program.

Remember: you are leveraging the skill, knowledge, and dedication of most of your employees. Give your employees guidance on what the program should accomplish and how, and then give them the space to execute that program. With the proper support, you will find that your field crews and office personnel will take the reins and help you develop and implement a workable safety program without a dedicated safety person. This process will take time as your personnel learn and adjust to their new responsibilities. Once personnel settle into the new program, their time devoted to safety will become more efficient and safety performance results will increase.

Some additional resources you may find worthwhile:

- "It's Your Ship," Captain D. Michael Abrashoff. Mr. Abrashoff turned a U.S. naval ship around from the lowest rating to the highest-rated ship in the Navy fleet. He accomplished this by using simple and solidly wise management practices that are easily adaptable to any organization. The book is an easy read and well-presented.
- OSHA Website - Construction Industry and General Industry sections
    - www.osha.gov
- OSHA Publication 2254
    - www.osha.gov/Publications/osha2254.pdf
- American Society of Safety Professionals (ASSP) – Formerly known as The American Society of Safety Engineers (ASSE), this group offers many solid safety articles on a variety of topics.
    - www.assp.org
- Safety and Health Magazine - Safety and Health Magazine is a professional safety publication (like ASSP above) that offers thorough and thoughtful articles on safety.
    - www.safetyandhealthmagazine.com
- OSHA Regional Office Telephone: (303) 844-5285 or (313) 843-4500 for Colorado, Montana, North Dakota, South Dakota, Utah, and Wyoming.
    - When calling with a safety question, ask for the Duty Officer and your call will be routed to an experienced OSHA person who can answer your questions.

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