



A GUIDE TO WRITTEN WORKPLACE SAFETY

Your Road Map To Safety



This guide provides you with a strategy for developing a management plan to address safety concerns in your company. It's important that your workplace be as safe as you can possibly make it, and we believe this guide will help you accomplish that goal.

If, after you have read this information, you experience any difficulty in the development of your Written Workplace Safety Program (WWSP), please contact the Safety Consultation and Training Section (SCATS) of the Division of Industrial Relations for assistance at 1-877-4SAFENV or at the locations listed on page 2. You may also want to visit our website at www.4safenv.state.nv.us.

Let SCATS be **Your Partner for a Safer Nevada!** Services that can assist you include: workplace surveys by safety consultants, air monitoring by industrial hygienists, and regulatory training programs, including training to assist you with your Written Workplace Safety Program.

Thank you for helping to make your place of work safe.

FREQUENTLY CALLED NUMBERS & ADDRESSES

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INTRODUCTION

INTRODUCTION

What Is A Written Workplace Safety Program (WWSP)?

A WWSP is a management approach for identifying, evaluating, analyzing, and controlling workplace safety and health hazards. This includes developing systematic policies, procedures, and practices fundamental to creating and maintaining a safe and healthy working environment. Translation... it's your road map for safety and health!

Why Develop A WWSP?

- The implementation of a WWSP is a proven and effective method for reducing the number of accidents and injuries among your employees. Controlling injuries can save your company money in workers' compensation costs, reduce employee time away from work, and help improve employee productivity and morale.
- In Nevada, the law requires you to develop and implement a WWSP if your company manufactures explosives or has 11 or more employees.
- You and your business can potentially save a lot of money!

Where (How) Do I Start?

First you should develop a safety policy statement.

Your safety policy statement should:

- Be signed by the most senior officer in the organization.
- Explain the goals and objectives of your safety and health program.
- Consist of short, clear and concise statements each employee can recite.
- Reinforce the principle that safety is everyone's responsibility.



Remember:

The written safety program and all training programs required pursuant to this section must be conducted and made available in a language and format that is understandable to each employee. NRS 618.383 (4)

Here Are A Few Examples:

Example 1: Safety Policy Statement

"The personal safety and health of each employee in this company is of primary importance. Prevention of occupationally-induced injuries and illnesses is of such consequence that it will be given precedence over productivity, whenever necessary. To the greatest degree possible, management will provide necessary equipment, procedures, and training required for personal safety and health."

Example 2: Safety Policy Statement

"It is essential to our employees, customers and bottom line that we maintain a safe and healthy workplace. Managers and supervisors will ensure the policies adopted by the company to assure that our employees are not injured at work are implemented and adhered to by all employees."

ABOUT THIS GUIDE

In order to make developing a WWPS program easier, we have divided the program into six (6) required elements. Their order is neither chronological nor hierarchical. You may find that some other approach works better for you, or your operation. Go for it! This is a performance standard. That means we provide you with the basic requirements, and you do whatever it takes to meet those requirements.

With almost any destination, there's more than one way to get to a safe and healthy workplace! The objective is to have a working program that:

- Addresses safety and health issues in your company,
- Is implemented within your business, and
- Readily adapts to changes in operation.

As you review the guide,
watch out for the following:



CAUTION



TIP



REMEMBER

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RESPONSIBILITY

ELEMENT 1

RESPONSIBILITY

NAC 618.540(1)(a) Requires:

Your WWSP must include *a statement explaining that the managers, supervisors and employees are responsible for carrying out the program.*

A Good WWSP Should Include:

An explanation of how the responsibilities for safety and health have been assigned to MANAGERS, SUPERVISORS, EMPLOYEES, and any other entities (such as safety committees) in your organization. This section should state who is responsible for specific activities within the program.

Why?

Clear assignments of responsibility will allow each employee, supervisor, and manager to know what activities and behaviors are expected. This allows for clear communication rather than assumptions or misinterpretations of what needs to be completed. Further, without assigning clear lines of responsibility, you will not be able to establish accountability for the implementation of your program. What employees, supervisors, and managers are held accountable for is what normally will get accomplished in your operation. Be as specific as you can and then hold them to it. Use this as part of your performance appraisal process to evaluate employee effectiveness.

HOW TO DO IT...

Assess your current business activities, positions, and responsibilities. Make a list of all employees, showing date of hire, job description, and what experience and training each might have. List operations, activities, hazard controls, and training required.

Once you have these lists, decide who should be responsible for what, how they will do it, and how they will interact with others. Be specific and write it down! If position titles are used in the program for each item of responsibility rather than specific names, use a cover sheet with the specific names for each position title. Remember to update the names as changes are made.



Tip:

Include an organization chart showing lines of accountability!



Remember:

You must *assign at least one person to be in charge of occupational safety and health.*
NRS 618.375(4)

YOUR RESPONSIBILITY SECTION MIGHT LOOK LIKE THIS:

Example 3: Responsibility Assignment

The President:

- Promote a safe and healthy culture throughout the organization.
- Set high standards and lead by example.
- Ensure that financial, material, and personnel resources are provided to achieve the goals and objectives of the safety and health program.
- Ensure that the program is fully implemented and effective.

The Safety and Health Director:

- Ensure compliance with all applicable federal, state, and local safety and health requirements.
- Ensure that each employee is provided with adequate and appropriate occupational safety and health training.
- Promote safety and health and serve as a resource to all staff.
- Ensure that the safety and health policies are comprehensive and effective.
- Review each accident and conduct an investigation when an accident has resulted in serious injury or property damage.
- Review the program on an annual basis.

District Manager:

- Ensure that each element of the program is implemented in his/her facility.
- Ensure that all Department managers, Division supervisors, and Unit foremen comply with the program.
- Ensure that all required documents (including the OSHA Injury and Illness logs) are maintained.

Department Manager:

- Ensure that safety/health surveys are conducted in the department on a regular basis, the frequency of which shall not be less than once per quarter.
- Ensure that each piece of equipment in his/her department is properly maintained.
- Ensure that each supervisor, foreman and employee in his/her department complies with the program.

Division Supervisor:

- Ensure that each foreman and employee in his/her division complies with the program.
- Ensure that each employee in his/her division receives appropriate training upon initial assignment, changes in processes, procedures, equipment, or assignments.

Unit Foreman:

- Conduct a daily safety and health inspection of his/her work area(s).
- Ensure that each employee receives refresher training when required by law or whenever circumstances indicate the need for retraining.

Employees (without regard to position or station):

- Be an active participant in the safety and health program.
- Perform tasks in accordance with established policies, procedures, and safe work practices.
- Perform a safety evaluation of his/her work-space daily.
- Inspect all tools and equipment prior to use, to identify any hazards.
- Question any unsafe and unhealthy practice or condition, and act to correct and report it.
- Report any injuries, illnesses, or incidents to the appropriate person.

The Safety Committee:

- Promote safety and health by conducting a safety and health campaign each quarter.
- Encourage communication between employees and management.
- Serve as an oversight committee on all issues relative to safety and health.
- Make recommendations to the Safety and Health Director whenever appropriate but not less than once per quarter.

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HAZARD ID, ANALYSIS & CONTROL

ELEMENT 2

HAZARD ID, ANALYSIS & CONTROL

NAC 618.540(1)(b) Requires:

Your WWSP must include *an explanation of the methods used to identify, analyze and control new and existing hazardous conditions.*

A Good WWSP Should Include:

Holding regular inspections of your facilities, review and analysis of high-hazard operations, conducting accident investigations, analyzing injury trends, and taking action to eliminate future injuries. Be specific and identify who will be completing each activity, when they are to complete the activity, and how this will be evaluated for effectiveness.

Why?

The Nevada Occupational Safety and Health Act requires that all Nevada employers “*furnish employment and a place of employment which are free from recognized hazards that are causing or are likely to cause death or serious physical harm to his or her employees.*” NRS 618.375(1) That’s one big challenge! In order to fulfill this obligation, you must have a plan! An effective hazard control program will be an invaluable tool in helping you prevent accidents and injuries.

HOW TO DO IT...

Identify

Before you can correct any hazards, you will first need to identify them. Make a list of all of your:

- Principal Operations and Locations
- Major Equipment
- Plant and Office Layouts

After you’ve made your list, the best way to find the hazards is to go and look for them! Conduct frequent workplace inspections to identify uncontrolled hazards. Your plan should identify who will conduct the inspections, how the individuals conducting inspections will be trained in hazard recognition, how often the inspections are to be completed, who will correct the hazards, and how this will be documented. This will define the responsibilities of identified individuals, the actual expected activity, and training.



Caution:

The person(s) to whom you assign the responsibility of conducting inspections should have training in hazard recognition.



Remember:

SCATS has consultants who can assist in identifying your hazards and also offers training programs on hazard recognition to help your employees become more proficient. These services are free to you.

You can also use the following tools (among others) to help you identify your workplace hazards:

- Employee Observations
- Exposure Monitoring
- Job Safety Analysis
- Accident/Injury Investigations



Remember:

Inspections need to be conducted on a continuous basis!

The frequency of your inspections should be based on your activities, severity of hazards present, and/or facility needs.



Remember:

Dangers can exist in any of the following four components of your operation. so be sure to evaluate all of these as you search for hazards:

1. Materials
2. Equipment
3. People
4. Environment

HAZARD ID, ANALYSIS & CONTROL

Analyze

Once your hazards and potential hazards have been identified, you should list the methods you intend to use to analyze them. Analyzing your hazards is an important step in reducing the potential for accidents, as it will help you use your resources more effectively when you begin to correct them.

Determine the severity and probability of each hazard. This can assist you in prioritizing corrective actions.

Severity

Means “what type of damage or injuries would result if the accident does occur?”

- **High:** death, permanent disability or chronic/irreversible illness
- **Medium:** injuries or temporary, reversible illness resulting in hospitalization or temporary disability
- **Low:** injuries or temporary, reversible illness requiring only minor supportive treatment

Probability

Means “what is the likelihood that the accident will occur?”

- Greater
- Lesser

Each of these components should be evaluated independently. Once this has been done, you can combine the two (2) components to determine the gravity of each hazard.

For example, a hazard with a high severity and a greater probability would have a higher gravity than one with a low severity and lesser probability. Confused? This should help...

Severity	Probability	Gravity
High	Greater	Greater
High	Lesser	Moderate
Medium	Greater	Moderate
Medium	Lesser	Moderate
Low	Greater	Moderate
Low	Lesser	Low

Again, this is merely one way to prioritize your hazards. You may already have a better system in place, so use what works for you.

Here are some other sources of information you may find useful in helping you analyze your hazards:

- Loss Reports
- OSHA Injury and Illness Logs
- Accident Reports
- Incident or “Near Miss” Reports
- Employee Input
- Your Personal Observations
- Job Safety Analysis
- Inspection Reports

These sources of information can assist you with accident trend analysis. If there are accident trends, this can indicate poor accident investigation and corrective action, or identify an area in which further evaluation and controls must be implemented. This may also include evaluating procedures and supervision. Accident trends alert you to take a second look and re-evaluate to determine proper controls for hazards.

HAZARD ID, ANALYSIS & CONTROL

Control

Now that the hazards have been pinpointed (identified) and characterized, it's time to get rid of them! If you can, why not completely eliminate the hazard(s)?

Can you...

- Change the entire process?
- Change your procedures?
- Use a different and/or less hazardous material?

If not, you must control the hazard(s) by using one or more of the following:

- **Engineering Controls** such as guards, barricades, and ventilation systems.
- **Administrative Controls** such as changing work schedules, assignments, or procedures. Generally, to control hazards, your employees will need to be trained in hazard recognition and how to reduce their exposure. Examples of administrative and procedural controls include lockout/tagout procedures, hazard communication programs, exposure control plans, and confined space entry programs.
- **Personal Protective Equipment (PPE)** such as eye protection, hand protection, and respirators. PPE should always be used as a last option. Solutions should be sought in engineering or administrative controls first.



Tip:

Prompt correction of hazard(s) will increase employee trust!



Caution:

Failure to correct hazards after they have been identified is not only unwise, it could also result in higher penalties in the event of citations. An uncorrected identified hazard could result in a willful citation if discovered by a Nevada Occupational Safety and Health Administration (OSHA) compliance officer.

Your Hazard ID, Analysis and Control section might look like this one:

Example 4: Hazard ID, Analysis, and Control

“We recognize that in order to maintain a safe and healthy working environment, we must be vigilant in our efforts to identify, analyze, and control any existing or potential hazards in our shop. The following shall serve as a guideline for our efforts.”

Identification:

Hazard identification shall be accomplished using the following means:

1. Safety/Health Inspections.
2. Employee Safety Hotline.
3. Reports of Safety Monitors.
4. Review of Records. (Hazard Bulletins, etc.)

Department supervisors will conduct inspections in their departments quarterly on the first Friday during the months of February, May, August, and November.

Hazards reported through the employee safety hotline will be sent to the corresponding department supervisors. The information from the hotline will not include the names of the employees who called. The goal is to learn what the hazards are and correct them. No one will take any adverse action against anyone for identifying a hazard.

The reports of the safety monitors will be sent to the safety committee and the plant manager.

The safety manager will evaluate the hazard bulletins and provide them to the department supervisors to be addressed at the next department meeting.

HAZARD ID, ANALYSIS & CONTROL

Analysis:

We will use any means available to analyze hazards including:

1. Performing a job hazard analysis for each job description.
2. The use of area and personal environmental sampling.
3. Reviewing our policyholder statements.
4. A periodic review of accident investigation reports.
5. Trend analysis of our OSHA Injury and Illness log.

The safety manager will coordinate the hazard analysis effort.

The safety manager will review accident investigation reports to identify the need to improve training, evaluate if corrective action has been addressed, and determine that action has been taken to reduce injuries. Any problems identified may indicate a need to address the system, processes, and controls.

The safety manager will communicate results of the area and personal sampling to the employees and supervisors. The supervisors must correct problems resulting in levels discovered that are beyond acceptable limits. Any necessary action out of the supervisor's control will be directed to the plant manager and safety committee. Until the controls are in place, employees will be removed from the high exposure areas or provided with the appropriate personal protective equipment.

Department supervisors will conduct a job hazard analysis at least annually for each job classification in their departments and ensure they are up to date. This includes a hazard assessment for personal protective equipment (PPE).

The safety manager and safety committee will evaluate accident trends from the policyholder statements and OSHA Injury and Illness log while ensuring the appropriate confidentiality. They will notify and work with the department managers to evaluate solutions and implement procedures or controls to reduce future injuries.

Control:

After a hazard has been analyzed, it must be given priority based on its overall gravity. Hazards will then be controlled by the following methods:

1. Any hazard that can be eliminated will be.
2. All other hazards will be controlled by using engineering or administrative controls or a combination of these as appropriate.
3. The supervisors must correct hazards within their control and ensure the remaining hazards are passed to the plant manager and safety committee for action.
4. The safety committee and plant manager will evaluate and implement controls for the hazards.
5. Administrative and work practice controls for hazards will be either designated as a separate program or part of our procedures. The following controls for hazards can be found in separate programs or procedures:
 - Chemical hazards: see Hazard Communication Program.
 - Fire, bomb threat, earthquake events: see Emergency Evacuation Procedure and Fire Prevention Plan.
 - Bloodborne pathogens exposure: see Awareness Training for all employees and Exposure Control Plan for those employees with specific exposure.
 - Energy source hazards: See Energy Control Program and Lockout/Tagout Procedure.
 - Use of respirators: See the Respiratory Program.
 - Noise hazards: See the Hearing Conservation Program.
 - Workplace violence: See the Workplace Violence Program.
6. PPE will be used as a last option or as an interim measure.
7. The safety manager will monitor the progress of all abatement procedures and ensure that all affected employees are apprised of the status.
8. The safety manager will coordinate safety communication to vendors and subcontractors working within the plant.
9. The safety manager will provide the company president with the status of implemented controls, controls pending action, and needed controls based on injuries, hazards, and regulations.

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TRAINING

ELEMENT 3

TRAINING

NAC 618.540(1)(c) Requires:

Your WWSP must include *an explanation of the methods used to ensure that employees receive the appropriate safety and health training before performing their work duties.*

A Good WWSP Should Include:

Who will do the training, when and how often training will be completed, a list of the training required for your activities, how the training lesson plan will be maintained, and how the training records will be maintained. Items to train your employees on include, but are not limited to: your safety program, their rights and responsibilities, and mandatory training based on the OSHA regulations and State of Nevada statutes. Your written safety program should include an explanation of your training policy and procedures.

Why?

You must establish a training program for your employees. Providing training to your staff and employees is a crucial part of having an effective safety and health program. In fact it may be the most crucial element. After all, a well-trained employee can be a much safer and more productive employee.

HOW TO DO IT...

You will need to answer the following questions in your procedure:

1. Who is responsible for the training program?

Specify this individual by their name, title, or both.

2. Who will provide the training?

You may find that some training can be conducted in-house. Other topics requiring special expertise will need to be contracted to an outside source. In either case, clearly identify the person or company who will conduct the training.

Did you know:

SCATS conducts free safety and health training that provides awareness level training for those managers, supervisors, or employees who may be tasked to train in your organizations. Most of this training does not meet the requirements of OSHA standards (because it is not site specific) but will explain fundamental elements of many of the standards.

3. Who will be trained?

Your program will need to explain your procedures for providing training to the following people:

- New Employees
- Current Employees
- Temporary Employees
- Leased Employee
- Employees of Outside Contractors

4. What will the employees be trained on?

All employees must be trained on the written workplace safety program and the rights and responsibilities pamphlet per Nevada law. Additionally, employees should be trained in the hazards of their operations and how to reduce the hazards. Training is to be conducted particularly in areas where there have been recurring injuries or where explosives are manufactured. All training programs should address the following basics:

- The specific policies and procedures contained in your written workplace safety/health program.
- The specific training requirements of any applicable regulation or statute.
- Your company's general safety rules.

Some companies find it easier to make a list of training required by topic and position title, while some companies find it best to have a training matrix developed. Other companies have a list of mandatory one time training and a second list of annual retraining topics. Since training is based on the hazards of your operation, each company will have different requirements to address. Working with your industry association may help you identify industry specific training needs.



Remember:

Every employer shall, upon hiring an employee, provide the employee with a document or videotape setting forth the rights and responsibilities of employers and employees to promote safety in the workplace. NRS 618.376(1).

Note: You can contact SCATS to obtain the document or video in either English or Spanish, free of charge.

5. When will training be conducted?

Training is a continuous process. You should develop procedures that address the various times and circumstances under which training is needed, including:

- Before initial assignment.
- Whenever processes, procedures, equipment, or materials are changed.
- Mandatory retraining which may differ for many regulations: annual, every three years, etc.
- When employee performance or behaviors indicate that additional training is needed.



Caution:

An employer who contracts with a temporary employment service shall provide specialized training concerning safety for the employees of the service before they begin work at each site or as soon as possible thereafter. NRS 618.383(7)

6. What type of training will be provided?

Training can take many forms. You should decide which type of training is the most effective for your particular needs. Here's a partial list of your options:

- Formal ("Classroom" type training)
- Informal ("Tool Box" type training)
- Practical ("On-the-job" type training)
- CBT (Computer-based training)

Each type of training has its advantages and limitations, so be sure to carefully evaluate your options. Formal training is good for the mandatory specific training; informal training such as construction tool box talks can help with hazard recognition and hazard changes as the job progresses; on-the-job training assists in procedural training; and computer-based training can help with awareness or regulatory training. The combination of these training activities can help your company develop an appropriate safety culture.



Remember:

The written safety program and all training programs required pursuant to this section must be conducted and made available in a language and format that is understandable to each employee. NRS 618.383(4)



Caution:

Be sure to not confuse a “safety meeting” with training. Any training session, long or short, must have a specific purpose and be carefully planned.

7. Where will the training materials be maintained?

Many of the OSHA requirements mandate specific items be covered in training. A lesson plan will assist the trainer in ensuring all the necessary items are covered; provide consistency in the training; and help concentrate on the specific policies, procedures, and hazards of your operation. Your procedure should ensure that training lesson plans are developed, used for each topic, identify how they will be updated, and indicate who is responsible for their maintenance.

8. How will the training activities be evaluated?

You will need to determine a method to evaluate both the quality and effectiveness of your training activities. You may decide that tests and/or course evaluations are a good way to accomplish these objectives. Whatever you decide to do, remember this is a written program... so write it down!

9. How will the training records be maintained?

Remember that you will need to maintain documentation of the training you conduct. The length of time you will need to keep training records will vary depending upon the specific regulation that requires the records.



Caution:

NAC 618.542 requires:

1. *An employer who establishes a written safety program shall keep written records of:*
 - C. *The attendance of employees participating in the training programs.*
2. *The records must be:*
 - A. *Maintained for 3 years, and*
 - B. *Available for review by the Division upon request.*



Tip:

Nevada law encourages employers who are required to establish a written safety program to include, as a part of that program, the employment of a person who has completed certain training in basic emergency care of persons in cardiac arrest that:

- Included training in the operation and use of an automated external defibrillator and
- Was conducted in accordance with the standards of the American Heart Association or the American National Red Cross. NRS 618.384.



Tip:

Regardless of the format in which training is presented, planning is what separates a good training session from a not-so-good training session.

Example 5: Training

1. Joe Scythe (owner) is responsible for conducting all formal safety and health training.
2. All employees will be trained prior to beginning work; the core training areas will include:
 - WWSP procedures and responsibilities
 - Emergency Action Plan
 - First Aid Procedures
 - Other Company Policies
3. The employee's supervisor will provide specific training relative to each employee per his/her job description.
 - Cook
 - Dishwasher
 - Cashier
 - Server
 - Maintenance
4. Retraining will be provided on an as required or needed basis.
5. Training records will be maintained in each employee's personnel file.

The specific outlines can be found in the training manual for each job description.



Remember:

Supervisors are employees, too! All supervisors have safety responsibilities and many have never received any formal training in their safety responsibilities or requirements. SCATS has free classes available to help supervisors better understand their responsibilities.

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ACCIDENT INVESTIGATION & CORRECTIVE ACTION

ELEMENT 4

ACCIDENT INVESTIGATION & CORRECTIVE ACTION

NAC 618.540(1)(d) Requires:

Your WWSP must include *the procedures that must be followed to investigate an accident which has occurred and the corrective actions that are to be initiated.*

A Good WWSP Should Include:

Your program must explain how you intend to investigate accidents, and must contain your procedures for ensuring that adequate corrective actions have been taken to correct any hazards and deficiencies that were identified during the investigation. Simply completing OSHA injury and illness recordkeeping forms or insurance injury report forms does not constitute an accident investigation.

Why?

No one wants to have accidents. However, when one occurs, we must learn why so we may prevent recurrence. The idea is to find the root cause of the accident and implement corrective action so the accident will not happen again.

HOW TO DO IT...

1. Accident Reporting

In order to be able to investigate an accident you must first know one has occurred. Thus, the first step must be to ensure that you have an efficient and clear accident reporting procedure. Be sure to explain who must do what and by when. Include both internal and external notification and reporting procedures.



Remember:

Have a plan or procedure to take care of the injured worker!

2. Accident Investigation

You will need to explain your accident investigation procedures:

- Who will conduct the accident investigation?
- How will the information be collected? (Specify forms, etc.)
- What happens to the investigation report?

To investigate an accident properly, the following information must be obtained:

- Who was injured?
- Where or when did the injury occur?
- What was the injury?
- What part of the body was affected by the injury?
- What object, substance, exposure, or bodily motion inflicted or contributed to the injury?
- How did the injured person come in contact with the source of injury?
- What hazardous condition or circumstance caused or permitted the occurrence?
- Where was the hazard?
- What unsafe act, if any, caused or permitted the occurrence of the event?

Generally, you will find direct, indirect, and root causes of any accident. The direct cause is the actual event or “unplanned release of energy or hazardous material.” The indirect causes may be the unsafe act, unsafe condition or a combination of the two that can tie back to training, supervision, or disciplinary action. The root cause is usually related to poor implementation of management policies and decisions; or it could be from personal or environmental factors.



Caution:

You may use OSHA injury and illness recordkeeping forms and insurance documents as long as you include corrective action taken and maintain medical confidentiality!

ACCIDENT INVESTIGATION & CORRECTIVE ACTION

3. Corrective Action

After an accident has occurred, you will want to do everything within your power to see that it doesn't reoccur. You will need to develop procedures to promptly correct deficiencies and act on recommendations resulting from your accident investigations. Your accident investigation form should include not only suggested corrective action, but also what action was taken when.



Tip:

A tracking system should be devised to make certain corrective actions are taken in a timely manner. Also, corrective actions should be examined, after a time, to ensure that they are truly effective.

Your accident investigation should not be an attempt to assign blame. Remember the goal is fact finding, not fault finding.



Remember:

OSHA updated its recordkeeping rule and expanded the list of severe injuries that employers must report to OSHA.

As of January 1, 2015, all employers must report:

1. All work-related fatalities within 8 hours.
2. All work-related inpatient hospitalizations, all amputations and all losses of an eye within 24 hours.

Only fatalities occurring within 30 days of the work-related incident must be reported to OSHA. Further, for an in-patient hospitalization, amputation, or loss of an eye, these incidents must be reported to OSHA only if they occur within 24 hours of the work-related incident.

Your accident investigation section might look like this one:

Example 6: Accident Investigation & Corrective Action

SECTION IV

1. All on-the-job injuries and illnesses will be reported to the employees' supervisor as soon as practical after occurrence.
2. All accidents/incidents will be investigated by the security department.
 - A. The officer conducting the investigation will complete an I-9 "investigation" form.
 - i. Section K "accident summary" will be submitted to the safety committee for review.
 - B. The supervisor of the injured will ensure that the appropriate worker's compensation forms are completed.
 - C. The injured will complete an I-7 "statement" in addition to any other required documents.
 - D. Corrective action will be initiated by the supervisor of the area involved.
 - i. An I-10 "abatement log" will be used to track abatement action. The I-10 will be posted and updated weekly until all abatement is complete.

Note: If this type of system is used you will need to provide examples of the various forms for reference.

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Safety Committee

**Program
Compliance**

Accident Investigation
& Corrective Action





PROGRAM COMPLIANCE

ELEMENT 5

PROGRAM COMPLIANCE

NAC 618.540(1)(e) Requires:

Your WWSP must include *a method for ensuring that employees comply with the safety rules and work practices.*

A Good WWSP Should Include:

Develop a clear procedure that explains:

1. Who will be responsible for disciplinary actions?

Front line supervisors may be the best choice for administering disciplinary action for minor violations. However, more serious disciplinary action may be reserved for upper-level management.

2. What disciplinary actions will be taken?

Be sure that the “punishment fits the crime.” It may not be appropriate to use a progressive disciplinary action where very serious infractions have occurred. Use your own judgement, but be sure that your policy is clear, and that all employees understand it and it is uniformly enforced.

3. Where will disciplinary records be maintained?

Wherever you decide to keep them.



Remember:

Your program will only be effective if all employees and managers are held accountable for their responsibilities and safety performance.

**Tip:**

Be sure to enforce your disciplinary program fairly and consistently. Supervisors who allow employees to violate safety rules must be held accountable.

Your enforcement policy might look like this one

Example 7: Program Compliance

1. Violations of safety rules and policies will be addressed in the following manner.
 - A. First incident: Verbal warning
 - B. Second incident: Written reprimand
 - C. Third incident: Written reprimand with one day suspension
 - D. Fourth incident: TERMINATION
5. Each supervisor will be responsible for administering this policy to his/her subordinates.
6. All records will be maintained in the employee's personnel files.

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Responsibility

Safety
Committee

Program Compliance





SAFETY COMMITTEE

ELEMENT 6

SAFETY COMMITTEE

NRS 618.383(2)(b) Requires:

If an employer has more than 25 employees, or if an employer's employees are engaged in the manufacture of explosives, the establishment of a safety committee. The safety committee must include representatives of employees. If the employees are represented by a labor organization, the representatives of employees must be selected by the employees and not appointed by the employer.

NAC 618.540(2) Requires:

Except as otherwise provided in this section, an employer with more than 25 employees who is required to establish a safety committee pursuant to NRS 618.383 shall include in the written safety program:

- A. The manner in which members of the committee are selected;*
- B. The purpose and duties of the committee; and*
- C. The frequency of the meetings of the committee.*

A Good WWSP Should Include:

As discussed earlier, this is a performance standard, so you will decide which activities you assign to your safety committee. Make sure they match the assignments you have listed in your "responsibilities" section. Also, be sure to:

- Describe the manner in which the committee members will be selected.
- Define and list the duties and purpose of the safety committee.
- Determine the frequency of the safety committees meetings.
- Provide training to the members of the safety committee.
- Explain how, where, and by whom records will be maintained.

Why?

Safety committees are an extremely effective means of getting managers and employees to work together on safety and health issues.

Safety committee members can be assigned by management, voted on (mandatory if represented by labor organization) by employees, or selected from volunteers. Some companies find volunteers to be the most active, while other companies will rotate all employees through the committee to advance their knowledge. Decide what works best for your business!



Remember:

It is recommended that the safety committee have an equal number of management and employee representatives. If the employees are represented by a labor organization, then the employees' representatives must be selected by the employees. The terms of the committee members should be staggered in order to provide continuity to the committee.



Tip:

Your safety committee will function more efficiently if your meetings have codes of conduct. You may want to try Robert's Rules of Order.

The purpose and duties of the safety committee will vary based on the needs of the operation and change as the program changes. Make sure your program is updated as necessary.

The purpose of a safety committee might be to:

- Evaluate accident trends and suggest needed improvements and alternative solutions.
- Evaluate department inspection reports verifying corrective action was taken; identifying trends requiring further research; or assigning individuals to complete the research for input in the evaluation.
- Audit the safety program and verify proper implementation.
- Serve as a secondary source for employees to submit hazards without the fear of reprisal.
- Evaluate training sources for improved staff knowledge of safety and health.
- Promote safety activities.
- Develop a safety newsletter, bulletins, or posters.
- Conduct inspections.
- Combination of the above or others, but be specific in your program to give guidance.

SAFETY COMMITTEE

Safety committee members should be trained in how to work on a committee (Robert’s Rules of Order or other committee system being used), how to conduct inspections and recognize hazards, how to evaluate accident trends, accident investigation techniques, and available safety and health resources within the company and the local area. The duties should be specific as to what action members are to take to meet the purpose of the committee.

The meeting frequency and dates should be identified to ensure on going activities.



Caution:

If the safety committee conducts accident trends or investigations, ensure that the confidentiality controls are in place.



Remember:

The safety committee should grow with your company. Construction companies may have core people on the committee and add employees and supervisors as they grow.

Your safety committee might operate like this one:

Safety Committee

I. Mission:

To foster open and on going communication and cooperation between employees and management on all issues relative to safety and health.

II. Membership:

The safety committee will consist of one manager and one employee representative from each department.

- A. Management representatives will be appointed by the board of directors.
- B. Employee delegates will be elected from a general election of their peers.
- C. The Safety Director will serve as the chairperson of the safety committee.

IV. Responsibilities:

The safety committee will:

- A. Hold meetings as prescribed in section IV of this chapter.
- B. Periodically review and update existing work practices.
- C. Develop quarterly safety and health awareness campaigns.
- D. Conduct an annual comprehensive workplace safety and health inspection.
- E. Compile and distribute an annual report on hazards found in the facility.

VI. Meetings:

- A. The safety committee will meet on the second Friday of each month unless otherwise announced.

II. Meeting Rules:

- A. All meetings will be governed in accordance with "Robert's Rules of Order".
- B. A quorum will consist of three (3) management representatives and three (3) employee delegates.

III. Records

Records from all safety committee meetings will be handled as follows:

- A. Minutes of all committee meetings will be drafted by the secretary.
- B. The original minutes will be forwarded to and retained by the Safety Director for a period not less than five (5) years.
- C. Copies of minutes of all safety committee meetings will be:
 - 1. Posted on the employee bulletin board in the cafeteria.
 - 2. Sent to each safety committee member and manager and supervisor.
 - 3. Forwarded to the board of directors.

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IMPLEMENTING
YOUR PROGRAM

IMPLEMENTING YOUR PROGRAM

NAC 618.538 Requires:

An employer who enters into business in this State after May 18, 1994, shall, within 60 days after the date on which his or her eleventh employee is hired in the State, establish a written safety program in accordance with NRS 618.383 and NAC 618.538 to 618.544, inclusive.

NRS 618.383(1) Requires:

Except as otherwise provided in subsections 8 and 9, an employer shall establish a written safety program and carry out the requirements of the program within 90 days after it is established.

Now that you've written the program, it must be implemented.

You've taken the first step... it's all carefully planned and written down! It's now time to put the program into practice. The heart of your program revolves around two unwritten features: employee involvement and continuous improvement of the program.



Remember:

Your program should reflect what you are doing, not what you would like to do! It should not reflect what you did in the past that is no longer being done.

OTHER REQUIREMENTS



OTHER REQUIREMENTS

A Word About Other Requirements (Or, How Do My Other Programs Fit In?):

With the aid of this guide and other resources that are available, you should be able to write a program that meets or exceeds the requirements of NRS 618.383. However, you must consider other laws and statutes with which you must comply. Nevada enforces the federal OSHA standards found in 29 CFR 1910 and 29 CFR 1926. These are also known as the General Industry and Construction Standards, respectively. Each of these has general and specific requirements that may apply to your operation. Many of these standards require their own written program.

Some of these include but are not limited to the following:

- Hazard Communication Program (HAZCOM)
- Emergency Action Plan
- Fire Prevention Plan
- Energy Control Program and Procedures (Lockout/Tagout)
- Respirator Program
- Confined Space Program
- Exposure Control Plan (Bloodborne Pathogens Program)
- Fall Protection
- Chemical Hygiene Plan (Laboratory Safety Program)
- Hazardous Waste Operations and Emergency Response (HAZWOPER)
- Process Safety Management
- Other (Check appropriate standards)

Other programs, procedures or systems that are commonly required:

- Hot Work Permits
- Line Breaking Permits
- Injury and Illness Recording
- First Aid Protocol
- Hearing Conservation Program
- Personal Protective Equipment
- Safety-Related Work Practices (Electrical)
- Environmental Monitoring/Sampling
- Fire Watch
- Fire Brigade



Caution:

As the employer, it is your responsibility to know and comply with the applicable standards. Failure to do so can result in citations in the event of an enforcement inspection!

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FREQUENTLY ASKED QUESTIONS

FREQUENTLY ASKED QUESTIONS

Q. Must I establish a written workplace safety program?

A. Yes, if you are a Nevada employer with 11 or more employees or your employees are engaged in the manufacture of explosives. It's the law!

Q. How can I find out if my safety program complies with Nevada law, and with good safety practices?

A. SCATS offers assistance in the development of your written safety and health program at no cost. We also offer an assessment of your existing programs to see if they meet Nevada's requirements.

Q. What is the cost of SCATS' safety and health training classes?

A. Nothing. Our services are provided at no additional cost to you.

Q. What other materials on workplace safety are available to me?

A. You can receive at no additional cost to you:

- OSHA General Industry and Construction Standards
- Nevada Occupational Safety and Health Poster
- Regulations for the Nevada Occupational Safety and Health Enforcement Program
- Nevada Written Workplace Safety Program Guide
- Access to the Safety and Health Video Lending Library

Q. Are on-site consultations available for my business?

A. Yes. We'll gladly meet with you to make sure your business complies with all necessary safety and health requirements. Best of all, our services are free!

Q. How can I receive more information on setting up a safety and health program for my company?

A. Call SCATS at 1-877-4SAFENV, visit our website at www.4safenv.state.nv.us, or visit any of our offices.



APPENDIX

NEVADA REVISED STATUTE AND NEVADA ADMINISTRATIVE CODE

The State of Nevada is a State run OSHA program. The requirements for Nevada are specified in Chapter 618 of the Nevada Revised Statutes and further clarified in the related sections of the Nevada Administrative Codes.

Per NRS 618.295(8), Nevada adopts *“all federal occupational safety and health standards which the Secretary of Labor promulgates, modifies or revokes, and any amendments thereto...unless the division adopts regulations establishing alternative standards that provide protection equal to the protection provided by those federal occupational safety and health standards.”* Regulations Nevada adopts can be found in the Nevada Revised Statutes (NRS) and the Nevada Administrative Codes (NAC).

The Nevada Revised Statute (NRS) and the Nevada Administrative Codes can be obtained from the following websites:

- www.4safenv.state.nv.us
- www.leg.state.nv.us/law1.cfm

Note: The websites use the terms “NRS” and “NAC” rather than spelling out Nevada Revised Statutes and Nevada Administrative Code.

Regulations and statutes quoted in this guide were accurate as of publication.

NRS 618.383

Establishment of safety program: Duties of certain employers; requirements of program; training for temporary employees; regulations; exemption.

1. *Except as otherwise provided in subsections 8 and 9, an employer shall establish a written safety program and carry out the requirements of the program within 90 days after it is established.*
2. *The written safety program must include:*
 - A. *The establishment of a training program for employees concerning safety in the workplace, particularly in those areas where there have been recurring injuries or where explosives are manufactured.*
 - B. *If an employer has more than 25 employees, or if an employer's employees are engaged in the manufacture of explosives, the establishment of a safety committee. The safety committee must include representatives of employees. If the employees are represented by a labor organization, the representatives of employees must be selected by the employees and not appointed by the employer.*
3. *A representative of employees while engaging in the business of a safety committee, including attendance at meetings, authorized inspections or any other activity of the committee, must be paid by his or her employer as if that employee were engaged in the employee's usual work activities.*
4. *The written safety program and all training programs required pursuant to this section must be conducted and made available in a language and format that is understandable to each employee.*
5. *The Administrator of the Division shall adopt regulations establishing the minimum requirements for a written safety program.*
6. *The Administrator of the Division shall develop and provide each employer with a written guide for establishing a written safety program.*
7. *An employer who contracts with a temporary employment service shall provide specialized training concerning safety for the employees of the service before they begin work at each site or as soon as possible thereafter.*
8. *An employer who has 10 or fewer employees is exempted from the provisions of this section unless the employer has employees engaged in the manufacture of explosives.*
9. *For the purposes of this section, an employer in the mining industry shall not be deemed to be a manufacturer of explosives.*
10. *Except as otherwise provided in subsection 11, as used in this section, "explosives" means gunpowders, powders used for blasting, all forms of high explosives, blasting materials, fuses other than electric circuit breakers, detonators and other detonating agents, smokeless powders, other explosive or incendiary devices and any chemical compound, mechanical mixture or device that contains any oxidizing and combustible units, or other ingredients, in such proportions, quantities or packing that ignition by fire, friction, concussion, percussion or detonation of the compound, mixture or device or any part thereof may cause an explosion.*

11. *For the purposes of this section, an explosive does not include:*
 - A. *Ammunition for small arms, or any component thereof;*
 - B. *Black powder commercially manufactured in quantities that do not exceed 50 pounds, percussion caps, safety and pyrotechnic fuses, quills, quick and slow matches, and friction primers that are intended to be used solely for sporting, recreation or cultural purposes:*
12. *In an antique firearm, as that term is defined in 18 U.S.C. § 921(a)(16), as that section existed on January 1, 1999; or*
13. *In an antique device which is exempted from the definition of “destructive device” pursuant to 18 U.S.C. § 921(a)(4), as that section existed on January 1, 1999; or*
 - C. *Any explosive that is manufactured under the regulation of a military department of the United States, or that is distributed to, or possessed or stored by, the military or naval service or any other agency of the United States, or an arsenal, a navy yard, a depot or any other establishment owned by or operated on behalf of the United States.*

(Added to NRS by 1991, 2393; A 1993, 772, 1882; 1995, 579, 2037, 2038; 1999, 863, 865)

NAC 618.542

Records of written safety program. (NRS 618.295, 618.383)

1. *An employer who establishes a written safety program shall keep written records of:*
 - A. *The safety and health issues which are discussed at the meetings of the safety committee, if the employer is required to establish such a committee;*
 - B. *The attendance of those persons who participate in the meetings of the safety committee; and*
 - C. *The attendance of employees participating in the training programs.*
2. *The records must be:*
 - A. *Maintained for 3 years; and*
 - B. *Available for review by the Division upon request.*

(Added to NAC by Div. of Industrial Relations, eff. 11-5-93; A by R142-98, 2-28-2000)

NAC 618.538

Establishment of written safety program. (NRS 618.295, 618.383)

An employer who enters into business in this State after May 18, 1994, shall, within 60 days after the date on which his or her eleventh employee is hired in this State, establish a written safety program in accordance with NRS 618.383 and NAC 618.538 to 618.544, inclusive.

(Added to NAC by Div. of Industrial Relations, eff. 5-18-94; A by R142-98, 2-28-2000)

NAC 618.540

Requirements of written safety program. (NRS 618.295, 618.383)

1. *Except as otherwise provided in this section, in addition to the requirements set forth in subsection 2 of NRS 618.383, a written safety program must include:*
 - A. *A statement explaining that the managers, supervisors and employees are responsible for carrying out the program;*
 - B. *An explanation of the methods used to identify, analyze and control new and existing hazardous conditions;*
 - C. *An explanation of the methods used to ensure that employees receive the appropriate safety and health training before performing their work duties;*
 - D. *The procedures that must be followed to investigate an accident which has occurred and the corrective actions that are to be initiated; and*
 - E. *A method for ensuring that employees comply with the safety rules and work practices.*
 2. *Except as otherwise provided in this section, an employer with more than 25 employees who is required to establish a safety committee pursuant to NRS 618.383 shall include in the written safety program:*
 - A. *The manner in which members of the committee are selected;*
 - B. *The purpose and duties of the committee; and*
 - C. *The frequency of the meetings of the committee.*
 3. *In lieu of establishing a written safety program in accordance with subsections 1 and 2, an employer may establish an equivalent written safety program if the employer obtains the approval of the Administrator.*
- (Added to NAC by Div. of Industrial Relations, eff. 11-5-93; A by R142-98, 2-28-2000; R124-00, 9-6-2001)*

A photograph of a construction worker wearing a white hard hat with 'KELLY BA 1' on it, safety glasses, and a high-visibility yellow safety vest. The vest has a 'SCATS' logo on the left side. He is smiling and working on a wooden structure, possibly a ladder or scaffolding, with his hands on a vertical wooden post. Another worker in a similar safety vest is visible in the background. The entire image is overlaid with a semi-transparent green filter.

CHECKLIST

CHECKLIST

WRITTEN WORKPLACE SAFETY PROGRAM CHECKLIST

(Reference: NRS 618.383 and NAC 618.538-.542)

Employer: _____

Consultant: _____ Date: _____

Survey Number: _____

Does the WWSP meet requirements? _____

Is it being effectively implemented? _____

Please answer the following with "Yes" or " No"

_____ Does the employer have 11 or more employees?

_____ Regardless of the number of employees, does the employer have employees engaged in the manufacture of explosives?

If either questions above is answered "YES";

_____ Does the employer have a Written Workplace Safety Program?

Comments: _____

CHECKLIST

Element 1. Identifying Responsibilities:

_____ A statement explaining that the managers, supervisors and employees are responsible for carrying out the program.
Ref: NAC 618.540(1)(a)

_____ Has at least one person been assigned to be in charge of occupational safety and health? Ref: NRS 618.375(4)

Name & Title of Person Assigned _____

Recommendations:

- Does the written program include a policy statement about safety in the workplace?
- Is the policy statement signed by the employer?
- Is safety communicated as everyone’s responsibility?
- Have adequate responsibilities for managers, supervisors, and employees been assigned?
- Does the program include an explanation of how managers, supervisors, and employees are responsible for implementing the written safety program and how the continued participation of each will be established, measured and maintained?
- Does the program provide for adequate resources and support (people, time, money, and authority) for those assigned the responsibility for program implementation?

Comments: _____

Element 2. Identifying, Analyzing and Controlling Hazards:

_____ An explanation of the methods used to identify, analyze and control new and existing hazardous conditions. Ref: NAC 618.540(1)(b).

Recommendations:

- Has the responsibility for conducting inspections been assigned?
- Are work sites analyzed to determine high hazard areas?
- Are safety inspections scheduled for all work sites?
- Who conducts the inspections?
- Has the frequency of inspections been established and does the frequency of inspections correlate with the hazard potentials?
- What is the frequency of inspections?
- How are records of inspections maintained?
- Is there a procedure for correcting identified hazards?
- Is there a procedure for follow-up on corrective actions?
- Is there a procedure for providing for employee input with regard to hazards and other safety concerns?
- Does the procedure ensure that employees may make this input without fear of reprisal?

Comments: _____

CHECKLIST

Element 3. Safety and Health Training:

- _____ An explanation of the methods used to ensure that employees receive the appropriate safety and health training before performing their work duties. NAC 618.540(1)(c).
- _____ Is the training conducted in a language and format the employees understand? Ref: NRS 618.383(b)(4).
- _____ An employer who contracts with a temporary employment service shall provide specialized training concerning safety for the employees of the service before they begin work at each site or as soon as possible thereafter. NRS 618.383(7).
- _____ Are the training records maintained for three years?
Ref: NAC 618.542(2)(a).

(It is recommended that a company policy/procedure be included in your program that states how records are maintained and retained for three years.)

Recommendations:

- Has the responsibility for development and implementation of the safety and health training program been assigned?
- Is there a procedure to provide training for each employee concerning individual job assignments and identified hazards?
- Is there an appropriate list of training topics specific to each job, particularly in those areas where there have been recurring injuries?
- Have training lesson plans been established for each training topic?
- Is there a procedure to provide training for new employees before they begin work? Does this procedure address leased employees?
- Is there a procedure to provide training for outside contractors before they begin work?
- Is there a procedure to provide training for employees affected by new tasks or operations?
- Is there a procedure for follow-up training?

Comments: _____

Element 4. Accident Investigation and Corrective Action:

_____ The procedures that must be followed to investigate an accident which has occurred and the corrective actions that are to be initiated. Ref: NAC 618.540(1)(d).

Recommendations:

- Is there a policy or procedure for rendering first aid?
- Is there a procedure for transporting employees who need professional or advanced medical treatment?
- Is there a procedure for the timely reporting of injuries?
- Is there a procedure for investigating all accidents, incidents, and near misses involving either employees or property?
- Has the responsibility for accident investigation been assigned?
- Who is responsible for investigating accidents?
- Does the procedure for investigating accidents and incidents address the identification of corrective action?
- Are there procedures for follow-up and closure of all identified corrective actions resulting from accident investigation recommendations?
- Is there a procedure for documenting and maintaining accident records?
- Is there a procedure that addresses the required forms that must be filled out for the worker’s compensation insurance carrier?

Comments: _____

CHECKLIST

Element 5. Enforcing Safety Practices:

_____ A method for ensuring that employees comply with the safety rules and work practices. Ref: NAC 618.540(1)(e)

Recommendations:

- Are appropriate safety rules included in the program?
- Has the responsibility for administering disciplinary action been assigned?
- Are managers, supervisors, and employees held equally accountable for compliance with safety policies and regulations, and for accomplishment of assigned safety program responsibilities?
- Does the program provide for progressive discipline for those who violate safety policies?
- Is there a procedure for documenting and maintaining records of disciplinary action?
- Is there a form of positive reinforcement for individuals who comply with safe work practices or procedures?

Comments: _____

Element 6. Safety Committee: Ref: NAC 618.540(2)

An employer with more than 25 employees (or an employer who has employees engaged in the manufacture of explosives, NRS 618.383(2)(b) is required to establish a safety committee and shall include in the written safety program:

- _____ (a) The manner in which members of the committee are selected.
- _____ (b) The purpose and duties of the committee.
- _____ (c) The frequency of the meetings of the committee.
- _____ (d) Are the records of safety committee meetings and activities documented and maintained for at least three years?
NAC 618.542(2)(a)

(It is recommended that a company policy/procedure be included in your program that states how records are maintained and retained for three years.)

CHECKLIST

Recommendations:

- Are the purpose and duties of the safety committee specified?
- How are the members of the safety committee selected?
- The safety committee has _____ management representatives and _____ employee representatives.
- Has the frequency for safety committee meetings been established?
- What is the frequency?
- Are there provisions established to train the safety committee members?
- Have procedures been established to assure that the minutes or results of the safety committee meetings are communicated to the employees?
- How is the information discussed in the safety committee meetings communicated to other employees?

Comments: _____

Other written programs you may be required to develop and implement:

- _____ Hazard Communication Program (HAZCOM)
- _____ Emergency Action Plan
- _____ Fire Prevention Plan
- _____ Energy Control Program and Procedures (Lockout/Tagout)
- _____ Respiratory Protection Program
- _____ Permit-Required Confined Space Program
- _____ Exposure Control Plan (Bloodborne Pathogens Program)
- _____ Chemical Hygiene Plan (Laboratory Safety Program)
- _____ Hazardous Waste Operations and Emergency Response (HAZWOPER)
- _____ Process Safety Management
- _____ Other (Check appropriate standards)

CHECKLIST

Other programs, procedures, or systems that are commonly required:

- _____ Hot Work Permits
- _____ Line Breaking Permits
- _____ OSHA Injury and Illness Recording
- _____ First Aid Protocol
- _____ Hearing Conservation Program
- _____ Personal Protective Equipment
- _____ Safety-Related Work Practices (Electrical)
- _____ Environmental Monitoring/Sampling
- _____ Fire Watch
- _____ Fire Brigade
- _____ Workplace Violence
- _____ Other (Refer to the appropriate standards)

Comments: _____

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