



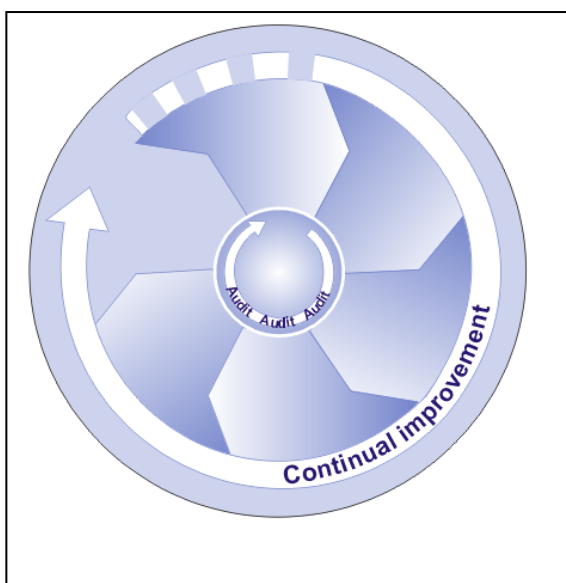
Occupational Safety and Health Policy and Implementation

Introduction

If you are a factory owner or manager, you cannot simply look at safety and health problems on an ad hoc basis and hope that the conditions in your workplace comply with national and international standards. Any preventive and control measures introduced in the workplace that will significantly impact on the work environment or require active participation from workers, have to be carefully planned in consultation with the relevant stakeholders, and based upon a clear, well-defined policy that can then be implemented, evaluated and improved continuously throughout the factory.

The key elements of successful safety and health management are shown in Figure 1.

Figure 1¹. Main elements of the OSH management system



Elements of Occupational Safety and Health (OSH) Management

Policy Development

Effective safety and health management requires the development of a comprehensive policy which not only meets national and international standards but also contributes to the overall business performance of your company. The rationale behind the policy is that it must be specific to your factory and should capture in a broad sense, the organizational procedures and arrangements necessary to ensure a safe and healthy place of work. In other words, from the policy, everyone should understand the company's approach to safety and health as well as its response. The activities implicated by the policy have to be cost-effective and aimed at achieving a safe and healthy working environment whilst at the same time reducing financial losses and liabilities. The policy is important because it represents a strategic plan for your company as a whole.

It should include, as a minimum, the following key principles and objectives² to which your organization is committed:

- protecting the safety and health of all members of the organization by preventing work-related injuries, ill health, diseases and incidents;
- complying with relevant OSH national laws and regulations, voluntary programmes, collective agreements on OSH and other requirements to which the organization subscribes;
- ensuring that workers and their representatives are consulted and encouraged to participate actively in all elements of the OSH management system; and

¹ ILO: Guidelines on occupational safety and health management systems, (ILO-OSH 2001), Geneva, 2001.

² ILO: Guidelines on occupational safety and health management systems, (ILO-OSH 2001), Geneva, 2001.

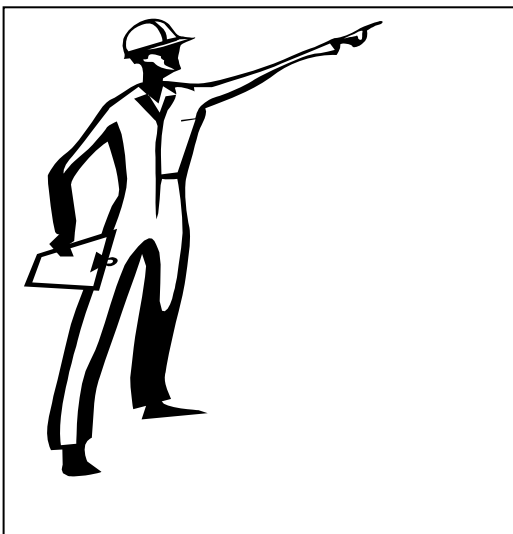
- continually improving the performance of the OSH management system.

The safety and health policy for your company should be in written form and be concise, readily understood by all stakeholders, approved/dated by the managing director/ management team/board, and brought to the attention of all workers, supervisors, managers, etc.

It should also:

- express management's responsibility and commitment to the protection of workers;
- state workers' general responsibility for adhering to employers' procedures and policy;
- encourage participation of both management and workers in joint safety and health committees;
- be in a format and language that all workers can understand. In a case where literacy levels may be low, alternative methods have to be used to explain the policy;
- be displayed prominently throughout the factory and explained in detail to all new workers;
- be regularly reviewed to meet new challenges in the workplace or improved if an evaluation exercise shows that the policy is not meeting its objectives or new forms of technology are being introduced and which were not covered under the existing policy.

Figure 2. Careful planning is required when developing an effective occupational safety and health management system in your factory.



If your company or factory already has a safety and health policy or is in the process of developing one, how do you know if it is appropriate? Here are some

basic questions that you need to ask yourself when cross-checking the policy³:

- Does the policy statement express a commitment to safety and health in your factory and are your obligations towards your workers made clear?
- Does the policy express a commitment for its implementation and continuous review?
- Is the policy signed by the owner or the managing director and dated?
- Have the views of managers, supervisors, workers/their safety representative, and of the safety committee (if it exists) been taken into account?
- Were the responsibilities described in the policy discussed and agreed with the people concerned? Do they clearly understand their duties/responsibilities, how much time they have set aside to carry out these duties, and what resources, if any, they have at their disposal?
- Does the policy make reference to the importance of workers' participation and co-operation? For example, does it refer to workers taking part in joint inspections or being active members of safety and health committees?

It is worth repeating that your safety and health policy is a strategic plan which links management's intentions to specific goals and objectives in your factory to ensure a safe and healthy place of work. Quite apart from satisfying national legal requirements as specified under the relevant regulations, and the standards laid down in international instruments, a well thought-out policy, that has been prepared in consultation with all stakeholders, can bring real competitive advantage and social benefit.

Organization – responsibility and accountability

It is no good having the best policy as a written document unless it is put into practice. This requires organization. This involves establishing responsibilities and relationships which promote a positive safety and health culture throughout the company from top to bottom. It must be emphasized that it is the

³ Adapted from B. Alli: Fundamental principles of occupational health and safety, ILO, Geneva, 2001 and Writing a safety policy: guidance for employers, Health and Safety Executive, UK.

employers who have overall responsibility for the protection of workers' safety and health. If you are the owner or managing director of a factory, it is up to you to provide leadership for safety and health activities. Following full consultation and agreement with all stakeholders, it is your duty to allocate responsibility, accountability and authority for the development, implementation and performance of your safety and health policy. This ranges from ensuring that safety and health is a line management responsibility which is known and accepted at all levels, to establishing effective arrangements to identify, measure (if possible) and control work-related hazards and risks and to promote health at work. It is also your responsibility to ensure that arrangements are made for the full participation of workers and their representatives in the successful development and implementation of the safety and health policy. The appropriate resources (time, money, training etc.) have to be provided so that those workers and supervisors given responsibility for safety and health in the factory can carry out their duties properly.

Other organizational arrangements include:

- assisting with the establishment of joint safety and health committees;
- allocating the various responsibilities on occupational safety and health to designated personnel, including identifying who will be responsible for fire drills, first aid, training and reporting investigations and recording accidents;
- ensuring that the designated people have the relevant competencies to perform their duties on safety and health;
- ensuring that the requisite safety and health training is carried out throughout the factory at no cost to the workers;
- making sure that all workers understand the policy and can identify who is responsible for which areas so that any problems can be reported;
- keeping full records of inspections, accidents, ill health etc;
- obtaining from suppliers full details of products used (e.g. Safety Data Sheets on all chemicals used in the factory);
- providing a two-way communication system so that senior management can report safety and health issues to the workforce and vice versa;
- ensuring that safety and health in the factory is a dynamic, on-going activity in the factory and not just introduced at the time of a visit by a Labour Inspector.

REMEMBER:

1. **Workers' representatives on the joint safety and health committee should be elected by workers. The selection process should not be influenced by management.**
2. **Management should ensure that the safety officers selected are well trained in safety and health.**

Planning and implementation

Having developed the policy and made the organizational arrangements, it is now time to implement the policy – this requires careful planning and co-ordination to be successful. This involves an initial inspection of your factory using a checklist to identify, for example:

- how the current national regulations, international standards and collective agreements are being applied;
- what hazards and risks to safety and health may be present in your factory;
- any control measures that may be available and assess their effectiveness;
- how well documents and records of safety activities are kept eg. training and inspection records;
- the extent of emergency prevention, preparedness and response times, as for example, in the case of a fire in the factory;
- data analysis from accident/sickness register etc;
- the arrangements for the provision of first aid;
- what arrangements are in place or need to be introduced to ensure workers' consultation, co-operation and, most importantly, their active participation;
- any special arrangements required for the procurement of goods and services; and
- any special arrangements for sub-contractors, contractors on site or visitors to the factory.

Once this initial inspection has taken place (it may take several days to audit the entire factory in detail), it is important to draw-up plans, develop programmes and procedures, and establish priorities based upon relative risks. It is also important to set goals and performance standards for management action and establish a realistic timetable. This will help to

minimize risks to safety and health and give you a baseline against which all future standards can be measured.

Evaluation

It is essential to monitor your safety and health performance on a regular basis – all too often, good initial progress and enthusiasm wane and standards slip. It is up to management to establish procedures to monitor, measure and record safety and health performance in the factory. Such procedures could involve regular inspections by members of the safety and health committee, seeking external audits and advice from the Labour Inspectorate, and analyzing data such as sickness or accident records. Companies that have good safety and health records measure their performance on a regular basis against pre-determined plans and agreed standards and are continually “fine-tuning” so as to improve performance.

Below is a checklist that will help you to assess the level of preparedness of the safety and health management system in your factory. If you answer “**No**” to many of these questions you will need to take action. The type of action can be noted in the box “**Action required**”.

Summary

It is important to note that the introduction of a good safety and health management system not only improves working conditions for the workers but it also has a positive impact on the balance sheet through increased productivity, fewer accidents and ill health, high staff morale, less staff turnover, and a positive image to the buyers.

A successful safety and health management system is made up of:

- policy development;
- organization – responsibility and accountability;
- planning and implementation; and
- evaluation.

This requires consultation, co-operation and commitment from all stakeholders. Workers’ participation is seen as a vital part of the process.

Policy and Implementation Checklist

	Yes	No	Action required
Does the factory have a written OSH policy?			
Is someone from senior management responsible for implementing the policy?			
Is a separate budget available for implementing the policy?			
Are copies of the policy displayed in the factory?			
Are copies of the policy available in local languages and explained to the workers?			
Were workers consulted in drawing up the policy?			
Is there a safety and health committee at the factory?			
Are workers involved on this committee?			
Do all workers receive safety and health training and understand the provisions of the policy?			
Is there a Safety Officer in the factory?			
Are there safety representatives (management and/or workers) in the factory?			
Have these safety representatives received training?			
Is your factory covered by any regulations on occupational health and safety?			
Are management and workers aware of the provisions of the OSH regulations?			
Are copies of these OSH regulations available for management and workers to consult?			
Have the Labour Inspectorate visited the workplace in the last 12 months?			
Have any prohibition or improvement notices on the grounds of OSH ever been issued by the Labour Inspectorate to the factory?			