# Injury and Illness Prevention Programs

# An Introduction to Workplace Prevention Programs

## Training from the
## NJ Work Environment Council

**WEC**

# About WEC

The New Jersey Work Environment Council (WEC) is a non-profit collaboration of organizations working for safe, secure jobs, and a healthy, sustainable environment.

Visit WEC's website at www.njwec.org

**For more information about WEC programs and services, contact:**
Cecelia Gilligan Leto
New Jersey Work Environment Council
142 West State Street – Third Floor, Trenton, NJ 08608-1102
Telephone: (609) 695-7100 Extension 308
Fax: (609) 695-4200
E-mail: info@njwec.org

# Injury and Illness Prevention Programs

Training from the New Jersey Work Environment Council

## About Prevention Programs

Every employer should have an overall injury and illness prevention program. Prevention programs improve health and safety conditions for both large and small employers, reduce workplace injuries and illnesses, improve compliance with laws and regulations, and reduce workers' compensation premiums.

OSHA has announced that it will develop an Injury and Illness Prevention Program standard (rule) in the near future.

**Effective training** about Injury and Illness Preventions Programs can help achieve safer, healthier, and more productive workplaces.

**WEC's curriculum** covers key aspects of an effective workplace prevention program. Training introduces the concept of effective management systems and explain why facilities should establish a prevention program at their workplace.

**The New Jersey Work Environment Council (WEC)** can provide **free** training at your workplace. This training includes free materials. The training is supported by a grant from the U.S. Occupational Safety and Health Administration (OSHA). Training can be from two to eight hours.

**For more information, contact:**
Cecelia Gilligan Leto, Project Coordinator
WEC, 142 West State St., Third Floor
Trenton, New Jersey 08608

Call: (609) 695-7100, Extension 308
Fax: (609) 695-4200
E-Mail: cgilliganleto@njwec.org

# The Small Group Activity Method

## Basic Structure

The Small Group Activity Method* is based on a series of problem-solving activities. An activity can take from 45 minutes to an hour. Each activity has a common basic structure:

- **Small Group Tasks**

- **Report-Back**

- **Summary**

**1. Small Group Tasks:** The training always begins with groups working together at their tables. Each activity has a task, or set of tasks, for the groups to work on. The task asks that the groups use their experience and the factsheets to solve problems and make judgments on key issues.

**2. Report-Back:** For each task, the group selects a scribe who takes notes on the small group discussion and reports back to the class as a whole. During the report-back, the scribe informs the entire class as to how his or her group solved the particular problem. The trainer records each scribe's report-back on large pads of paper in front of the class so that everyone can refer to them.

**3. Summary:** Before the discussion drifts too far, the trainer needs to bring it all together during the summary. Here, the trainer highlights the key points of the activity and brings up any problems or points that may have been overlooked during the report-back.

*The Small Group Activity Method (SGAM) is based on a training procedure developed by England's Trades Union Congress (TUC) in the 1970s. The Labor Institute and Oil, Chemical, and Atomic Workers Union (now part of the United Steelworkers) used a similar method around economic and health and safety issues for workers and further developed the procedure into SGAM. The New Jersey Work Environment Council has used SGAM since 1986.

# Three Basic Learning Exchanges

The Small Group Activity Method (SGAM) is based on the idea that every training is a place where learning is shared. With SGAM, learning is not a one-way street that runs from trainer to worker. Rather SGAM is a structured procedure that allows us to share information. It is based on three learning exchanges:

- **Worker-to-Worker**

- **Worker-to-Trainer**

- **Trainer-to-Worker**

**Worker-to-Worker:** Most of us learn best from each other. SGAM is set up in such a way as to make the worker-to-worker exchange a key element of the training. The worker-to-worker exchange allows participants to learn from each other by solving problems in their small groups.

**Worker-to-Trainer:** Lecture-style training assumes that the trainer knows all the answers. With SGAM it is understood that the trainers also have a lot to learn and this is the purpose of the worker-to-trainer exchange. It occurs during the report-back and it is designed to give the trainer an opportunity to learn from the participants.

**Trainer-to-Worker:** This is the trainer's opportunity to clear up any confusion and make points they think are key. By waiting until the summary section, trainers know better what people need to know.

# The Factsheet Reading Method

The process described below focuses everyone on the important information in the factsheets.

The process is as follows:

- **First, select a scribe for this Task.**

Each of you will be assigned a small number of factsheets to read. You will then share the factsheet information with your table.

- **Your trainer will assign your individual factsheets this way:**

- **Starting with the scribe and moving to the left, count out loud from one to eight. Keep going around the table until all numbers (factsheets) are distributed. The assigned numbers correspond to Factsheets 1 through 8 on the following pages.**

Once everyone has read their assigned factsheets individually, your scribe will go around the table and ask each of you to explain to the group what you have learned. Factsheets should be explained in the order assigned (1 through 8), since the factsheets build on the previous one. In this way, we all start at the same place and with the same information.

# Injury and Illness Prevention Programs

Training from the New Jersey Work Environment Council

## An Introduction to Workplace Prevention Programs

### Purposes

To learn about some essential elements of an effective Workplace Injury and Illness Prevention Program.

To learn about OSHA's planned Injury and Illness Prevention Program Standard.

---

**Note: Throughout these training activities, an Injury and Illness Prevention Program will be simply called a "Prevention Program."**

---

### Training from the NJ Work Environment Council

# Task 1

## Scenario:

Last year the Regent Bike Corporation went through a company-wide reorganization. In an effort to reduce costs the company has discontinued safety audits and no longer allows workers to participate in the safety committee meetings. Laminated "Think Safety First" posters were hung throughout the facility.

For the last three months the Regent Bike Corporation has had a string of accidents and near-misses. It took a worker being seriously injured and taken to the hospital, for the company to reevaluate their safety program.

You are assigned to compile a list of recommendations for how the company can improve its workplace prevention program.

**In your groups, review the factsheets on pages 4 through 14, then using the factsheets and your own experience, make a list of recommendations for improving the Regent Bike Company's safety program. Be ready to explain why the company should implement your recommendations and what factsheet you used.**

### Recommendations

1)

2)

3)

4)

5)

6)

# Task 2

**At your tables pick a scribe or note-taker to keep track of your group discussion. Working together, circle conditions that exist at your facility.**

   A.  Outdated and/or ineffective policies or procedures

   B.  Ineffective training or education methods

   C.  Insufficient internal communications (examples: between shifts, departments, or management and worker)

   D.  Lack of employee participation in all aspects of hazard identification, assessment, and prevention

   E.  Lack of visible leadership by management setting a tone for a safe and healthy workplace

   F.  Infrequent investigations of accidents or near-misses

   G.  Employees uncomfortable or afraid to report unsafe conditions

   H.  Other _____

**Thinking of your own facility, rate your company's performance and recommendations to improve your workplace prevention program.**

| Program Element | Rate Your Company's Performance | Recommendations for Improvement |
|---|---|---|
| **Management Leadership** | ❏ Excellent<br>❏ Very Good<br>❏ Average<br>❏ Fair<br>❏ Poor | |
| **Worker Participation** | ❏ Excellent<br>❏ Very Good<br>❏ Average<br>❏ Fair<br>❏ Poor | |
| **Hazard Identification and Assessment** | ❏ Excellent<br>❏ Very Good<br>❏ Average<br>❏ Fair<br>❏ Poor | |
| **Hazard Prevention and Control** | ❏ Excellent<br>❏ Very Good<br>❏ Average<br>❏ Fair<br>❏ Poor | |
| **Education and Training** | ❏ Excellent<br>❏ Very Good<br>❏ Average<br>❏ Fair<br>❏ Poor | |
| **Program Evaluation, Recordkeeping and Improvement** | ❏ Excellent<br>❏ Very Good<br>❏ Average<br>❏ Fair<br>❏ Poor | |

# 1. OSHA's Plan to Propose an Injury and Illness Prevention Program Standard

OSHA has announced that it will propose an Injury and Illness Prevention Program standard (or rule), referred to here as the **"Prevention Standard."**

**What It Will Require**

- Many employers will have to have a program to "find and fix" hazards. (In states which cover public employees, public employers must also adopt a prevention standard)

- The program will likely have to cover the following elements:

    1. Management leadership.

    2. Worker participation.

    3. Hazard identification and assessment.

    4. Hazard prevention and control.

    5. Education and training.

    6. Program evaluation, recordkeeping, and improvement.

Each employer's program can be tailored to the size of the enterprise and the nature of the potential hazards workers face. The employer will not address the six Prevention Program elements with a "one size fits all" solution.

**What OSHA Says a Prevention Standard Will Accomplish**

- Reduce workplace injuries and illnesses.

- Improve employer compliance with existing laws and regulations.

- Reduce costs (including employers' workers' compensation premiums).

- Level the playing field for the thousands of responsible employers and 15 states that already have partial prevention programs.

**Where It Stands**

- OSHA issued an "Injury and Illness Prevention Programs White Paper" in January 2012 that explains the need for a Prevention Standard.

- OSHA held five stakeholder meetings across the country where it gathered the views of large and small businesses, state officials, workers' union representatives, and occupational safety and health organizations such as WEC and other "COSH" groups.

- Before a Prevention Standard can go into effect, OSHA must publish a formal proposal, invite comments, and hold public hearings. Typically, it takes a few years for OSHA to issue a new standard.

## 2. Why Management Should Support Prevention Programs

- **In some cases, prevention is cheaper than injuries and illnesses.**

  - Lack of prevention drains money in lost time, lost productivity, workers' compensation, and the cost of replacing employees and equipment.

  - We apply this principle in our own lives every day. That's why we change oil in our cars or keep gutters clean.

- **Prevention programs have been proven to work for both large and small employers.**

  - The Department of Defense, the nation's largest employer, adopted a prevention program to protect workers employed or stationed at the nation's military installations and reduced its lost workday rate by 41 percent.

  - Small businesses in Ohio that established prevention programs cut workers' comp cases by an average of 52 percent and the cost per claim by 80 percent.

  - A recent RAND Corporation study found that average injury rates declined more than 20 percent over a two-year period at workplaces where California's prevention standard was fully enforced.

- **An OSHA Prevention Standard** would help level the playing field and make irresponsible employers operate by the same rules as everyone else. It would require many more employers to have a Prevention Program suitable for their workplaces, not just employers that are committed to worker safety.

## 3.  A Model Injury and Illness Prevention Program

**Occupational Health and Safety Management Systems.** The American National Standards Institute (ANSI) and the American Industrial Hygiene Association (AIHA), with input from management and worker representatives and safety and health professionals, issued in 2012 a voluntary standard for a "best practice" prevention program. This is called ANSI/AIHA Z10-12.

**Research proves that an effective Injury and Illness Prevention Program should include the following elements:**

1. Management leadership.

2. Worker participation.

3. Hazard identification and assessment.

4. Hazard prevention and control.

5. Education and training.

6. Program evaluation, recordkeeping, and improvement.

As of 1991, a written, effective Injury and Illness Prevention (IIP), Program is required for every California employer.

## 4. Elements of an Effective Prevention Program: Management Leadership

The implementation of an effective prevention program includes a commitment by the employer to provide the visible involvement of top management, so that all employees, from management to line workers, fully understand that management has a serious commitment to the program.

An effective program should have a team approach, with top management supporting the following:

- Protection and continual improvement of employee health and safety.

- Effective employee participation.

- Compliance with all laws.

Top management must be responsible for preventing and controlling hazards by:

- Providing "appropriate financial, human, and organizational resources" to protect workers' safety and health.

- Holding management personnel accountable for prevention and control of hazards.

- Instituting policies that place safety and health on the same level of importance as production. The responsible implementation of this policy requires management to integrate production processes and safety and health protection to assure that this protection is part of the daily production activity within each facility.

- A commitment to assign and communicate the responsibility for the various aspects of their health and safety program so that all managers, supervisors, and employees involved know what is expected of them, in a form readily understandable by all workers.

- Instituting a communication system that encourages all workers to inform their managers and supervisors about workplace hazards without fear of reprisal.

# 5. Elements of an Effective Prevention Program: Hazard Identification and Assessment

Employees and management should participate in a process to identify potential hazards in the workplace.

- Since we are all human and will make errors sooner or later, the workplace should be designed so that an error will not result in an injury or illness.

- For each work process or material used, employees and management should ask whether there is a way to make it safer or reduce exposure, using the types of controls described in "Hazard Prevention and Control."

- Potential hazards should be reviewed by referring to state and federal laws and to records of injuries, illnesses, and near-misses.

- Hazards should be identified again before new processes or materials are brought into the workplace.

- Employees who do the work should be consulted in purchasing decisions to ensure that the safest materials are chosen.

- Identification of hazards should include the work of contractors as well as employees.
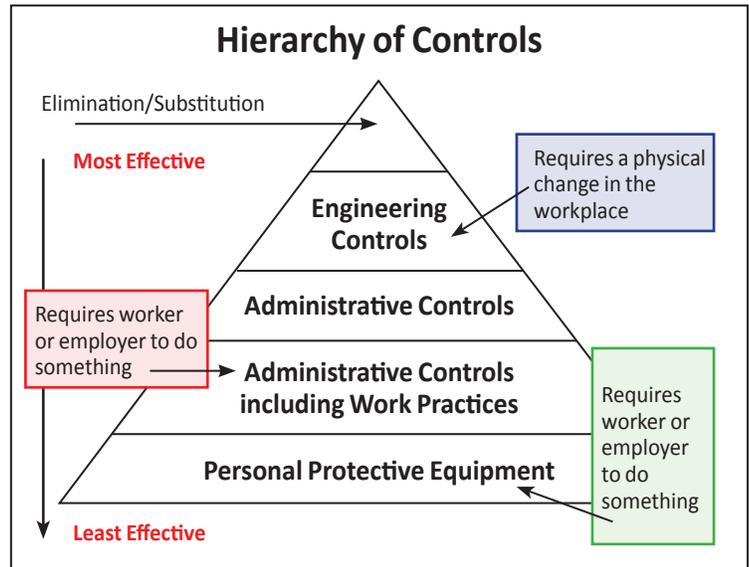
---

**Management of Change**

The objective of a management of change process is to minimize the introduction of new hazards and risks into the work environment when changes are made such as in technology, equipment, facilities, work practices and procedures, design specifications, raw materials, organizational staffing changes, and standards or regulations. Any management of change process should follow a Plan-Do-Check-Act model of continual improvement.

When changes are overlooked, additional hazards and risks may be introduced into the workplace.

*Based on ANSI/AIHA Z10, page 54.*

---

# 6. Elements of an Effective Prevention Program: Hazard Prevention and Control

To prevent and control hazards effectively, one must look at eliminating hazards, making fixes and bringing about real change by using OSHA's Hierarchy of Controls/Systems of Safety approach. Look first to eliminating hazards by making fixes and changes that address hazards at their source. If hazards cannot be completely eliminated, hazard control methods involving Engineering Controls are the next best way to address hazards.

**Hierarchy of Controls**

Elimination/Substitution

**Most Effective**

Engineering Controls

Requires a physical change in the workplace

Administrative Controls

Requires worker or employer to do something

Administrative Controls including Work Practices

Requires worker or employer to do something

Personal Protective Equipment

**Least Effective**

For training purposes, the pyramid concept has been slightly changed to a chart with examples of how the employer should start at the top of the chart with what is most effective – elimination (top of the pyramid), not start at the bottom with what is least effective.

| CONTROLS  EXAMPLES | EXAMPLES |
|---|---|
| **1) Elimination or Substitution** | • substitute less hazardous material<br>• reduce speed, force, amperage<br>• reduce pressure, temperature<br>• reduce number of contact points<br>• change process to eliminate noise<br>• perform task at ground level<br>• automated material handling |
| **2) Engineering Controls** | ventilation systems<br>• machine guarding<br>• sound enclosures<br>• circuit breakers<br>• platforms and guard railing<br>Warning Systems<br>• signs, backup alarms, labels |
| **3) Administrative Controls** | Procedures<br>• safe job procedures<br>• rotation of workers<br>• safety equipment inspections<br>• changing work schedule<br>Training<br>• Hazard Communication Training<br>• Confined Space Entry |
| **4) Personal Protective Equipment** | • safety glasses & face shields<br>• hearing protection<br>• safety harnesses and lanyards<br>• gloves<br>• respirators |

## 6. Hazard Prevention and Control (continued)

**The OSHA Safety and Health Management Systems E-Tool also suggests that facility management should:**

- Regularly and thoroughly maintain equipment.

- Ensure that hazard correction procedures are in place.

- Ensure that everyone knows how to use and maintain personal protective equipment. (For specific OSHA requirements on personal protective equipment, see OSHA's standard, 1910 Subpart I.)

- Ensure that, when needed, there is a medical program tailored to your facility to help prevent workplace hazards and exposures.

- Ensure that a plan is in place and employees are trained to respond to an emergency such as a fire, flood, or hurricane.

# 7. Elements of an Effective Prevention Program: Education and Training

Employees should be provided education and training about workplace hazards and how they can be prevented, eliminated, or controlled.

Training should be…

- In languages that employees understand.

- On paid time.

- For all new employees.

- For all employees given new assignments.

- For contractors as well as employees.

- Whenever new substances, processes, or equipment are brought into the workplace.

- Whenever new hazards are recognized.

- Provided by competent trainers.

- Designed to include participation (discussions, questions, hands-on experiences, role playing), not just lectures.

Training should cover employees' right to information and right to report hazards, accidents, illnesses, and near-misses without facing reprisals or penalties.

Employees and their representatives should be involved in developing and evaluating training programs to ensure that they are effective.

The voluntary ANSI/AIHA Standard for Safety Management Systems points out that "barriers to participation [in training] can include disability issues, training on uncompensated time, scheduling, training environment, and literacy and language issues."

# 8. Elements of an Effective Prevention Program: Worker Participation

The voluntary ANSI/AIHA Standard for Safety Management Systems points out that "non-supervisory employees...often have the most intimate knowledge of workplace hazards."

It says that employees and their representatives should be provided with:

- **Timely information about hazards. This could include:**

  - Accident, illness, incident, and near-miss records and investigation results.

  - Reports on employee exposure and hazard monitoring.

- **A process, resources, and time to participate in planning, evaluation, and implementation of hazard controls. This could include:**

  - Conducting workplace inspections and investigations.

  - Conducting surveys of workers to document work-related health problems.

  - Making recommendations for workplace improvements, including shutting down unsafe operations until hazards are corrected.

  - Developing a list of health and safety hazards and tracking management follow-up.

A provision of OSHA's Recordkeeping Rule reminds employers that it is an OSHA violation to discriminate against workers for exercising their right to report work-related injuries and illnesses. When workers lose prizes or receive automatic discipline when they report injuries, this can be illegal discrimination under 29 CFR 1904.36 and Section 11(c) of the OSH Act.

---

**OSHA's Whistleblower Protection Program**

OSHA enforces the whistleblower provisions of 22 laws protecting employees who report violations of various workplace safety, airline, commercial motor carrier, consumer product, environmental, financial reform, food safety, health care reform, nuclear, pipeline, public transportation agency, railroad, maritime, and securities laws. Rights protected by these laws include worker participation in safety and health activities, reporting a work-related injury or illness, or reporting a violation of the law.

---

## 8. Elements of an Effective Prevention Program: Worker Participation (continued)

Effective Joint Labor-Management Health and Safety Committees give labor and management a forum to discuss and hopefully resolve important health and safety concerns and issues.

Best Practices activities in which joint labor-management committees should regularly engage include:

- Research – which includes obtaining and analyzing injury and illness data; reviewing hazards and controls; identifying and documenting health and safety impacts from workplace changes; identifying and addressing weaknesses of health and safety training programs; and researching effective hazard control measures utilizing Hierarchy of Controls and Systems of Safety.

- Reviewing toxic and hazardous substances present in the workplace and before they are introduced.

- Reviewing new machines or changes to existing equipment, technology, work processes and procedures and proposing changes to make work and the workplace safer and healthier.

- Investigating accidents, incidents, near-misses and other adverse events.

- Ensuring worker and union involvement, in-depth inspections, and audits.

- Keeping records, tracking progress and evaluating success.

## 9. Elements of an Effective Prevention Program: Program Evaluation and Improvement

The real test of an effective health and safety prevention program is whether it prevents, removes, and controls hazards.

There are a variety of ways to evaluate the program for preventing illnesses and injuries, including:

- Workplace inspections and testing.

- Measurements of worker exposure.

- Tests of worker exposure.

- Records and investigations of accidents, near-misses, injuries, and illnesses.

- Records of hazards showing when they are removed or controlled.

- Employee participation in evaluating whether hazards are being prevented and controlled and in identifying improvements that are needed.

- Compliance with federal and state laws.

The voluntary ANSI/AIHA Standard for Safety Management Systems Standard cautions against relying only on injury and illness rates to measure control of hazards: "When injury indicators are the only measure, there may be significant pressure for organizations to 'manage the numbers' rather than improve or manage the [hazard prevention] process."

# Reference Page

*Injury and Illness Prevention Programs, OSHA White Paper, January 2012, http://www.osha.gov/ dsg/InjuryIllnessPreventionProgramsWhitePaper.html*

*California Injury and Illness Prevention Program Standard, http://www.dir.ca.gov/dosh/dosh_publications/iipp.html*

*Occupational Health and Safety Management Systems, ANSI/AIHA Z10, Approved: June 27, 2012 by the American National Standards Institute, Inc.*

*Based on OSHA's Safety and Health Management Systems E-Tool http://www.osha.gov/SLTC/etools/safetyhealth/comp3.html*

*OSHA's Ergonomics Program Management Guidelines for Meatpacking Plants http://www.osha.gov/Publications/OSHA3123/3123.html*

*Increasing the Effectiveness of Joint Labor-Management Health, Safety and Environmental Committees, for Health, Safety and Environmental Education of the United Steelworkers, Tony Mazzocchi Center, 2012*

# Injury and Illness Prevention Programs
# Training from the NJ Work Environment Council

**PROGRAM EVALUATION FORM**

**Location:**
**Date:**

**Trainer(s): Cecelia G. Leto**

Training Topic: Introduction to Workplace Prevention Programs

1.  Overall, how would you rate this training session?

    ___Excellent  ___Good  ___Fair  ___Poor  ___N/A

2.  Were the teaching methods (activities, exercise) effective?
    ___Yes  ___No  ___Not sure

    Comments:  _____
    _____

3.  Were the hand-outs and materials useful?
    ___Yes  ___No  ___Not sure

    Comments:_____
    _____

4.  Will the information you received in the training program be useful on your job?
    ___Yes  ___No  ___Not sure

    Comments:  _____
    _____

5.  How could this training program be improved?
    _____
    _____
    _____

6.  What subjects/topics should be added to (or taken away from) this training program to make it more useful?
    _____
    _____

7.  Additional comments: _____
    _____
    _____