

So, you want to be a SHARP company. What does that look like?

What is SHARP? The Safety and Health Achievement Recognition Program (SHARP) was developed by Oregon OSHA in order to encourage companies to learn to more effectively manage their own occupational safety and health programs. Oregon companies can take advantage of Oregon OSHA Consultation's expertise while they learn effective safety and health management techniques.

SHARP is intended to help companies improve their safety and health management systems by incorporating certain elements into those systems. SHARP companies strive for continuous improvement of their safety and health management systems in order to move them through a continuum toward self sufficiency.

The SHARP program has shown that if Oregon businesses are educated and coached to more effectively manage their own workplace safety and health programs, they will come to a point where continuous improvement is part of their culture.

In the SHARP process, you have your business evaluated by Oregon OSHA consultation staff to assess or "measure" your safety culture. Based on the information obtained during that visit, the consultation staff will make recommendations intended to help improve your management systems. You will be encouraged to address those recommendations in your action plans. Among those recommendations will be issues that are both code related and non-code related. Oregon OSHA's expectations are that all code related issues are brought into compliance before SHARP approval.

It is important to understand, that there is no template. No two companies are exactly alike, and no two SHARP companies have gone through the SHARP process in exactly the same way. The SHARP process is designed to be flexible enough to 'fit' virtually any company, and help the employer determine where they are in managing safety and health, so they can work to improve in the areas needed.

Participation in SHARP does not diminish the rights or responsibilities of Oregon employers or employees under the Oregon Safe Employment Act. Complaints, accidents, chemical spills, and other significant events will result in an Oregon OSHA enforcement inspection.

Finally, SHARP is not a goal. SHARP is a process that a company can go through in order to help achieve a goal of reducing workplace injuries and illnesses. When that goal is met, other benefits, such as improved morale, increased productivity, and reduced absenteeism are usually realized as well.

What do I do in order to be a SHARP company? You begin by working with Oregon OSHA consultation to develop and improve your safety and health management systems. Please visit the Oregon OSHA SHARP web site for additional tools that can help explain the SHARP process

A SHARP safety and health management program must successfully incorporate the following seven **elements**:

1. Management Leadership:

The most effective safety and health management systems are usually management led, but employee driven. *It is important that management be actively, visibly, and measurably involved in the entire safety process. Management must lead by example.*

Senior management at the site must consistently demonstrate clear and ongoing commitment to the safety and health policies. Such commitment is shown by management providing adequate resources to the overall safety and health efforts, including:

- Developing policies that provide clear priorities for safety and health;
- Considering safety and health to be a line rather than a staff function;
- Management personally following safety and health rules, leading by example;
- Delegating authority to those with assigned responsibilities;
- Allocating resources to support the safety and health systems;
- Ensuring that appropriate safety and health training is provided;
- Supporting fair and effective policies that promote safety and health performance;
- Placing value on employee involvement and participation in safety and health issues.

Safety and health leadership often starts with a written safety and health policy, essentially management's declaration of "how we will do things here." You could include a statement in the company safety and health policy explaining management's commitment to providing a safe and healthful place of employment. Such a written statement acts as a guide and clarifies your overall policy towards employee's health and safety. The statement should be signed by the highest company officer, to demonstrate top management commitment.

The safety policy statement should cover the goals and objectives of your safety and health program. It should consist of short, clear and concise statements that each employee can understand. Finally, the policy statement should reinforce the principle that safety is everyone's responsibility.

2. Employee Participation:

A successful program will include active and ongoing employee participation. Provide a framework for open, uninhibited employee communication concerning safety and health issues in the workplace. Encourage employees to be actively involved in the company's loss prevention efforts.

Such open dialog provides a means for employees to commit their insight and energy towards achieving the goals and objectives of your safety and health management plan. Employees must have the opportunity to be active participants in ways that meaningfully affect their safety and health at work.

SHARP companies continually look for opportunities to tap into the cumulative knowledge of their most valuable resources, their employees. A SHARP company will actively involve employees in:

- Developing effective processes to involve employees in safety and health issues;
- Organizational decision making regarding safety and health policy;
- Organizational decision making regarding safety and health resource allocation;
- Organizational decision making regarding safety and health training;
- Hazard detection activities;
- Hazard prevention and control activities;
- The safety and health training of co-workers.

The SHARP process requires employers to tap into their most valuable resource and engage employees as active partners in safety and health management. Essentially, employee involvement in safety and health leads to employee ownership of safety and health.

Employee involvement in safety and health is often provided for in workplace safety committees. Safety and health committees by themselves normally will not provide for enough employee involvement, and should be considered a minimum or starting point. Consider ways that employees can be involved in activities related to each of the seven major elements of effective safety management.

3. Hazard Anticipation and Detection:

A successful company should understand the types of hazards to which employees are exposed, and have *policies regarding* baseline hazard surveys, self inspection procedures, surveillance of hazard controls, and job safety/hazard analysis *in place*.

Successful safety and health management must include a system which calls for *thorough investigation of all accidents, injuries, and incidents*. The purpose of the investigation is not to place blame, but to determine root and basic cause(s) and any contributing factor(s), and then to develop corrective action(s) to prevent recurrence. There should be a system for reporting and correcting workplace hazards, as well as a review system for new or planned processes, material, or equipment. SHARP companies are expected to have systems in place to effectively evaluate their entire worksite to identify hazards and potential hazards. These systems include effective policies, plans or procedures for:

- Baseline hazard surveys of safety and health conditions;
- Regular self-inspections covering the entire facility;
- Conducting surveillance of established hazard controls;
- Hazard reporting;
- Change analysis of new or changed facilities, equipment, materials or processes;
- Accident investigation to determine root causes;
- Understanding MSDS usage relating to potential chemical hazards in the workplace;
- Conducting job-hazard-analysis, job-safety-analysis or phase hazard analysis;
- Having expert hazard analysis conducted periodically;
- Incident investigation to determine root cause.

Many hazards can be controlled as soon as they are found, and immediate control or elimination of hazards is preferred. However, some identified hazards must be analyzed to determine the most effective means of controlling them. Such analysis should evaluate both the probability of the hazard causing an accident or incident as well as the severity of the damage or injury that could occur.

4. Hazard Prevention and Control:

When hazards are identified, they must be controlled. Required OSHA programs should be in place and operating effectively. Emergency plans, safety and health rules, safe work practices, and effective maintenance procedures must be in place. Effective housekeeping policies and personal protective equipment usage requirements must be followed. Those hazards that are identified or anticipated must be systematically tracked and controlled. A SHARP company is expected to have implemented:

- Feasible engineering controls where possible;
- Effective safety and health rules in place and understood by the workforce;
- All applicable OSHA mandated programs;
- PPE usage procedures;
- Good housekeeping procedures;
- Emergency action plans;
- Emergency medical plans;
- Effective preventive maintenance procedures;
- Tracking procedures for hazard correction.

As hazards are found and identified, it is important that they be documented into some kind of tracking system to allow you to track these hazards from their initial identification all the way through completion in order to ensure that you 'close the loop' on each identified hazard. If hazards are found through your various hazard identification systems, but they are not tracked, you increase the likelihood of that hazard 'slipping through the cracks' and causing an incident, injury or illness at a future time.

Hazard controls should be selected in an appropriate hierarchical order, with preference on engineering controls first, followed by safe work practices, administrative controls, and personal protective equipment as a last resort. Managers, supervisors and employees should understand the hazard controls used and be able to explain the importance of hazard control prioritization. They should clearly understand their roles and responsibilities under each of the company's hazard prevention and control systems.

5. **Administration and Supervision:**

An effective program *will clearly and specifically assign safety and health duties and responsibilities*, to persons or positions. Individuals with assigned responsibilities must have the authority and resources to perform those duties. Detail the accountability systems the company will use. ***Performance evaluations, discipline, peer reviews, and incentive programs can all be used to establish accountability.*** A disciplinary policy should explain the consequences of not following company work rules. The policy should be fair, applied equally to everyone, and understood by all employees. ***An effective policy should reward good behavior while correcting deficient behavior.***

A SHARP company's program management will include systems to allow safety and health related tasks and responsibilities to:

- Be assigned to individuals or positions;
- Be clearly communicated to those responsible;
- Have an accountability mechanism in place for each assignment of responsibility;
- Persons with assigned responsibilities must have the ability to do the job;
- Persons with assigned responsibilities must have the authority to do the job;
- Persons with assigned responsibilities must have the resources to do the job;
- Company policies must promote performance of safety and health responsibilities;
- Policies must result in correction of non-performance of safety and health responsibilities.

Administration and supervision of an effective safety and health management program will call for you to detail the means or methods you will use to ensure that all personnel comply with your safety and health policies, rules, and procedures. Your programs can only be effective if employees, supervisors and managers are held accountable for their responsibilities and safety performance.

6. **Employee Training:**

Another crucial aspect to effective safety management is a ***detailed orientation process and job training procedures as well as evaluation procedures to measure the effectiveness*** of the training or re-training. *Job-safety-analysis (JSA) or job-hazard-analysis (JHA) should be used to enhance training when possible.*

Ensure that supervisors understand the hazards associated with the work being performed and their responsibility for the safety and health of workers under their direction. Employees must be knowledgeable regarding the hazards and potential hazards to which they may be exposed. They must understand how to protect themselves and co-workers from those hazards. SHARP companies are expected to provide:

Appropriate safety and health training for employees;
Initial orientation that covers applicable safety and health information;
Appropriate safety and health training for supervisors;
Supervisory training covering supervisory aspects of safety and health responsibilities;
Appropriate safety and health training for managers;

Management training that covers relevant safety and health management aspects. A well-trained employee is a safer and more productive employee. Proper training is an investment in the company's future and in the employees themselves. Your training program should explain your procedures for training new employees, current employees, temporary or leased employees, management, and employees of contractors who may work at your site. Be sure to cover the responsibility for providing orientation as well as training. Include information on how training will be provided, how often it will be provided, and how often the training will be reviewed and improved.

Your training program should include information regarding the various topics that employees will be trained in, both mandatory and voluntary subjects, and should cover the methods you will use to ensure all employees receive required training. The training curriculum should take into account updated job-specific information such as JHA or JSA as well as more broad-based material such as required OSHA programs.

7. **Planning and Evaluation:**

Each element of the safety and health management plan should be reviewed and updated as necessary, and at least annually. These reviews should be conducted jointly by management and employees *to determine if each component is functioning effectively and whether or not modifications should be made to better address company needs*. Goals should be set, and action plans or objectives put in place to achieve those goals.

Continuous improvement requires ongoing evaluation of "where we are," and then a plan to get us "where we want to be". Program strengths and weaknesses should be evaluated at least annually. A SHARP company will have effective systems in place to provide for:

Workplace injury/illness analysis;
Hazard incidence analysis;
Goals and objectives for safety and health;
Action planning to accomplish goals;
Safety and health management system review;
Review of mandated programs.

In order to plan where we wish to go, we must first evaluate where we are. We need to ask ourselves: Does the program say what we do? Is it doing what we need it to do? When our evaluation answers these questions, we need to ask ourselves: What can we do to make it better? To ensure our safety program(s) take us where we want to go, we need to plan that process in order to be successful. The planning process must include goal setting in order to provide you with a target.

The **single most important aspect** of your safety and health management program is **adherence to the program**. **If it is not actively followed and uniformly enforced, it will not be effective.** If your safety and health management program is implemented, and is strictly and uniformly followed, *it will over time reduce the pain and suffering* experienced by your employees as well as *reduce the amount of money* the company is paying into the worker's compensation system. Achieving SHARP shows your employees, your industry, and your community you are a leader in workplace safety and health. As a SHARP worksite, you demonstrate that a voluntary, cooperative, and proactive safety and health partnership between management, labor and government benefits all parties.

Oregon OSHA invites you to begin working toward SHARP. We invite you to take advantage of the skill and knowledge of our consultation staff as you work to improve your safety and health programs.

By accepting the challenge, you can save lives, reduce workplace injuries and illnesses, increase productivity, and improve the working environment of your organization.

Be recognized as a leader in workplace safety and health! Gain the respect and recognition you deserve for having a safety and health program that can be counted among the finest in Oregon.