B Lab®

Best Practice Guide

Creating an Occupational Health and Safety Policy

An Occupational Safety and Health (OSH) policy is aimed at protecting workers in the workplace, preventing the occurrence of injuries, accidents and diseases.

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Why have an OSH Policy?

Safety and health measures should ideally provide appropriate measures of protection for all workers, especially those in high-risk jobs and vulnerable workers (disabled, informal, migrant and young workers). The European Agency for Safety and Health at work identifies some of the benefits of developing and promoting worker safety and health:

- helps demonstrate that a business is socially responsibility
- protects workers
- helps maximize the productivity of workers
- enhances employees' commitment to the business
- builds a more competent, healthier workforce
- reduces business costs and disruption
- enables enterprises to meet customers' OSH expectations

Developing an OSH Policy

Why and how a company develops OSH policy depends on a variety of things. The use of a consultant/third party with expertise in the area will help in developing a comprehensive company OSH policy.

In developing the OSH policy, it is important to conduct a comprehensive job analysis for all positions in the organization and rank the severity of risk and hazards each employee is exposed to by virtue of their job description. This will help in formulating policies and procedures that will be relevant to the organization. An OSH policy that is too generic may fail to address specific risks due to the complex nature of the company's operations or may increase operation costs by establishing measures that are not necessary.

A company should also carry out research to determine if a national OSH policy/program is in place which it can use as a base for developing a policy for the company. Research into existing local policies can also help micro-enterprises and small and medium enterprises (SMEs) identify support mechanisms that can help them develop the policies/manuals.

A collaboration can be established with other organizations e.g. health practitioners that have affordable treatment packages for micro and small enterprises or a government program that subsidizes insurance and social security schemes.

When developing OSH policy, it is important to remember that the policy should be:

- Relevant to the sector the company operates in
- Specific to the company taking into account the size and activities done at the site. The policy a company develops should be practical in relation to the resources available.
- At a minimum, compliant with the national laws and regulations
- Participation of workers and worker representatives in organizing, planning and implementation of the OSH should be encouraged to ensure buy in/cooperation
- Endorsed by the senior management to ensure accountability
- Communicated and accessible to all workers in the organization
- Compatible or integrated to the existing management systems in the organization
- Lastly, after the final version of the policy has been drafted, the approval of the company directors/owners should be sought to establish accountability.

Together with OSH policy, there are other measures that a company should have in place to prevent/control work related hazards. Some of these issues include:

- Ensuring structures are appropriate for the work being carried out- employees have adequate work space, lighting, ventilation, the offices are located in a well-built structure;
- Labeling hazardous chemicals and equipment highlighting proper use;
- Limiting usage of hazardous chemicals and if possible replacing them with safer ones;
- Limiting exposure of workers to hazardous chemicals through rotation of shifts, educating them on risk of long term exposure;
- Providing protective gear for anyone handling hazardous materials and equipment (example safety goggles, face masks, gloves, ear plug-ins etc.);
- Promoting awareness of the work place Occupational Safety and Health policies through training workers, managers and supervisors, providing copies of the policies to workers, posting the policies and procedures publicly where workers can easily access (intranet, notice board);
- Ensuring machines are properly maintained to avoid unnecessary injuries. Provide training on new machines before they are used;
- Training on first aid, provision of on-site clinics or subsidized health care can better improve employee health. Where employees work with hazardous materials/chemicals, employees should undergo annual checkups.

Implementation

Once established, the company's OSH policy should be reviewed by an external person (if policy was developed in-house) with input from workers or the representatives. A review will help in identifying if the planned OSH system meets minimal requirements outlined in the national program, if it is cost effective and whether the planned controls are adequate to eliminate or control hazards/risks. Results from the initial review should be used in making decisions for the implementation of the OSH policy and provide a baseline for continual improvement of the system.

For the policy to be effective, the contents should be communicated to the employees:

Training
One way of communicating policies to employees is through training. Training programs on OSH policy should:
1. include all members of an organization (new and old, managerial and non-managerial)
2. be provided to staff at no extra cost and within working hours if possible
3. be conducted by a competent person
4. be reviewed periodically to be in line with any changes ensuring the training remains relevant and effective
5. include refresher courses at appropriate intervals
6. evaluate the comprehension of participants and the retention of the training. For example, emergency drills should be conducted at least annually to ensure the procedures and plans are known by employees (location of fire exits and extinguishers, assembling point)
7. be documented depending on the size and nature of activity of the organization
8. extend to proper use and maintenance of safety equipment

Accessibility
The policy should be easily accessible to the employees either through provision of a hard copy, posting it in a public place (e.g. office/plant notice board) or making it available on the company's intranet

Responsibilities

Responsibilities should be highlighted for each position so as to promote a sense of awareness on the need to be safe at work. Depending on resources available, a position responsible for the ensuring proper implementation of the policy should be identified (e.g. safety officer/director, plant manager, safety committee, internal auditor, external consultant etc.). An OHS budget or allocation of budget to OHS should help in ensuring adequate allocation of resources

Continuous Review

Continuous risk assessment and reviews (on at least an annual basis) to ensure the policy is up to date, meets the standards established at the beginning and are relevant within the existing operational framework. Internal audits or review should check on maintenance of equipment, state of protective gears, and storage of hazardous materials. The internal checks can be carried out by a safety officer if one exists or should be made responsibility of a member of staff. Reports from the checks can better identify staff cooperation and help identify areas of weakness

Data

Data on occupational injuries and diseases should be collected, analyzed and reported to identify causes. This will enable the organization to formulate appropriate ways to handle these problems. Reporting procedures should be laid out in relation to who will generate, receive and act upon the information provided in the report. The reports should be presented in a way that can be easily understood and should be available to all members of the organization who will use it.

Endnotes:

1   http://www.ilo.org/safework/lang--en/index.htm

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