



**ISRI**<sup>™</sup>

# SAFETY GUIDANCE MATERIAL

## SAFETY MANAGEMENT GUIDANCE

*This safety resource was written for the scrap industry by the scrap industry and was developed to assist you in making your scrap operation a safe place for employees, customers, and visitors. This resource covers OSHA requirements that may or may not be applicable to your operation.*

### RECORDKEEPING

#### APPLICABLE STANDARD:

- Title 29 CFR 1904 Recording and Reporting Occupational Injuries and Illnesses
- 1910.38 Emergency Action Plans
- 1910.39 Fire Prevention Plans
- 1910.132 Personal Protective Equipment
- 1910.134 Respiratory Protection Program
- 1910.147 Energy Control Procedure
- 1910.333 Electrical Lockout and Tagging Procedures
- 1910.1025 Lead Compliance Program
- 1910.1200 Hazard Communication

**EMPLOYEES AFFECTED:** Administration, management

#### WHAT IS IT?

Documentation proves that safety policies are in place, and that employees are adequately trained.

#### WHY IS IT IMPORTANT?

Documentation proves to regulatory agencies and your insurance carrier that your safety program exists. It is your backup for regulatory audits, and it also provides a means to keep track of workplace injuries from year to year. In short: **IF YOU DIDN'T DOCUMENT IT, IT DIDN'T HAPPEN**

#### WHAT IS REQUIRED?

- Document workplace injuries and illnesses as required by state and federal agencies.
- Document any steps required for compliance with OSHA standards (e.g., workplace assessment and employee training).
- Document all employee training to show date of training, who attended, and what topic was covered.
- Document all safety audits, including when they occurred, what hazards were identified, and the plan to correct them.
- Keep track of minutes of all safety committee meetings to ensure the program stays on track.

#### HOW DO YOU DO IT?

##### **Document injuries**

Federal standards require you to keep track of all injuries and illnesses. The tools to document this information are provided by OSHA as Form 300, Form 301, and Form 300A. These forms and instructions on how to complete them may be accessed on OSHA's website by visiting <http://www.osha.gov/recordkeeping/RKforms.html>. Even if you have zero injuries and illnesses in a given year, you must document on the form that none occurred. Every year, Form 300A must be posted for employee review from February 1 through April 30.



## **Document training**

Whether you have weekly tool box meetings or monthly safety meetings, you need to document that the training took place. Many companies will ask employees to sign a sheet of paper to show they attended a session. A very simple way to save all of this information is to use a three-ring binder. Create a tab for each training session, hole-punch the training document and sign-in sheet, and add them to the binder. Some companies will create a basic training matrix on a spreadsheet to see at a glance which employees have had what training. Documenting the training of new employees is also important. You may want to use a checklist assigned to each new employee to ensure he or she receives all the training necessary.

## **Document safety inspections**

As part of your safety program, you need to complete periodic safety audits (self-inspections). These audits need to be documented. Once again, the three-ring binder technique works well for this. Create a tab for each inspection and add the completed inspection form. After problem areas from the inspection are addressed, document that within the binder.

## **Document disciplinary action**

Keep track of all employee warnings, write-ups, and suspensions. Remember: even a verbal warning needs to be documented. For more on discipline programs, see the modules on "Safety Rules" and "Progressive Discipline."

## **Keep an eye on insurance claims**

Your insurance agent and your insurance company can provide you with "loss runs" for insurance claims you have filed. This information provides a record of insurance claims and can help you monitor the status of claims and what they cost. It is great way to see where losses are occurring and how to prevent them.

## **Keep score**

Managing safety is much like managing production and quality. You need to measure and monitor results. Keeping good documentation helps you look back to see where you came from so you can plan for the future. Use the OSHA logs and loss runs to see if you are getting better, staying the same, or getting worse. Let employees know the results. Let them play a role in making the operation safer.

## **WHERE CAN I GET MORE INFORMATION?**

- OSHA 3169 Publication, "Recordkeeping": <http://www.osha.gov/recordkeeping/pub3169text.html>
- Your insurance company