



weeklysafety.com

presents

Quick & Easy Survival Guide to Keep OSHA Off Your Back

Answers to Questions Every Employer Needs to Know

All Industries and Trades
Small – Midsize Businesses
Warehouse or Office
Construction or General Industry
Industrial or Outdoor Field Work
Contractors and Subcontractors
All Companies and Non-Profit Organizations
Government or University Departments



The Steps, The Checklist, The Answers

To start a safety program, or to make sure your current safety program is set up well, there are 7 important steps you need to be aware of and put in place.

This survival guide will give you...

- All 7 building blocks you need to have for a successful safety program
- The questions most organizations have about each step
- Comprehensive, but easy-to-understand, answers to every question and solutions you can implement today
- Expert advice from safety professionals with decades of experience
- Links to forms and checklists that you might need
- Exactly what you need to keep OSHA off your back!



7

Steps

- 1. Safety Manual** p. 4
- 2. Safety Meetings** p. 11
- 3. Compliance Training** p. 17
- 4. Incident Investigations** p. 20
- 5. Job Inspections** p. 26
- 6. OSHA Logs** p. 31
- 7. OSHA Reporting** p. 35



Safety Manual

1. Safety Manual

Why is it important to have a written safety manual?

A safety manual is the very first step in having a plan for safety for your company. A written safety manual, also called a safety plan or a safety program, captures the basic do's and don'ts that you want your team to understand when it comes to how they handle themselves, their work, and represent you specifically with regard to safety at your company.

Just as you may have a written employee guide that says you won't accept sexual harassment or theft of your tools; you need to have a written guide that says you won't tolerate blatant safety violations that endanger employees or the public.

1. Safety Manual

What do I need to have in a written safety manual?

Every safety manual should have some basic components to start with but can ultimately be as complicated as a 200-page technical manual. However, most safety manuals are not that way and really don't have to be.

Your safety manual does have to represent your company, the type industry you work in, and some of the specific tasks and hazards that your team might encounter on the job on any given day.

A few key components that should be in every safety manual are 1) a safety policy, 2) basic written do's and don'ts for safety, and 3) written hazard communication program. Many safety professionals would say that isn't enough, but a lot of companies could get away with something that simple.

1. Safety Manual

Can I buy a safety manual, or should I just write something?

Whether or not you DIY or purchase a safety manual depends on the size and complexity of your organization. If you have a small warehouse or shop with just a few employees, you can probably find or write basic do's and don'ts and pull together some free files from OSHA's website. If you've got manufacturing, construction, or are performing work that involves electricity, excavations, use of forklifts, or working at heights then you should consider purchasing a basic safety manual to start. This will dramatically decrease the amount of time you'll spend searching for resources.

Keep in mind that any safety manual you purchase will require your feedback. You know your business, your team, and what accidents and incidents have happened in the past three years. This type of information is what any good consultant would start with to customize your safety manual.

1. Safety Manual

What is a Safety Policy?

A safety policy is simply the top management of your company stating in writing that it is committed to preserving the health and safety of the employees.

A safety policy is usually a one-page document (two to three paragraphs) that clearly state that management cares about employees, it is committed to keeping everyone as safe as possible on their job, it will follow the rules when it comes to worker safety, and that it is willing to put in the resources needed to train, educate, and equip employees so they can stay safe at work.

The best safety policies are written in plain language and have a real signature of the highest official in the company, organization, or department at the bottom of the page.

1. Safety Manual

What is a hazard communication program?

For anyone that is not a safety professional the term hazard communication seems very broad and would lend you to believe that it is about any kind of hazard on the job. However, this is actually a false assumption.

Hazard communication for OSHA compliance purposes is specifically all about communicating [the hazards of chemicals](#) at your workplace. Regardless of the type of work that is done... a dental clinic, construction site, machine shop, or restaurant... OSHA requires a company to have a written document that talks about how the company is going to make sure employees are aware of the hazards associated with any chemicals they use on the job.

1. Safety Manual

Where do I keep the safety manual?

Too often a safety manual is left to collect dust in a binder on a shelf, behind the back seat of a pickup truck, or in the drawer of the safety guy.

The reality is that the safety manual needs to be thought of as a living document that is reviewed at least once a year. The safety manual needs to be accessible to all employees at all levels and they need to know that it exists. So... yes, it should be in a binder on the shelf in prominent areas such as a break-room in the shop. And it should be in every fleet vehicle so that workers don't have the excuse of saying "I didn't know". But it should also be on the desk of every manager that is responsible for people and on the desk of the Owner, Director & President.

***TIP:** the safety manual should also be posted online, on your secure network, where any worker can easily download the most current version quickly, if needed.*



2. Safety Meetings

Do I have to have safety meetings?

Yes. Especially if you are in any kind of construction or service industry that could lead you to be on a construction site. But every company, non-profit, and government organization that has employees should be having safety meetings.

If you aren't sure if this applies to you... it does. Every organization that has employees should be providing those employees with hazard awareness during regularly scheduled safety meetings.

The default OSHA regulation for the construction industry to consider states the following: **29 CFR 1926.21(b)(2)** *The employer shall instruct each employee in the recognition and avoidance of unsafe conditions and the regulations applicable to his work environment to control or eliminate any hazards or other exposure to illness or injury.*

2. Safety Meetings

How often do I have to have safety meetings?

We highly recommend at least weekly. Based on over 15 years of experience in a variety of construction and general industry settings a weekly safety meeting, toolbox talk, or tailgate safety meeting is the standard.

We've successfully built safety programs with small industrial companies where a monthly meeting worked great, but we took just a little longer during those sessions to maximize the time.

We have also worked with clients on high-hazard projects where a daily "safety huddle" was needed to keep the team focused and taking safety seriously.

You can experiment with the frequency but start out with weekly if possible and adjust from there.

2. Safety Meetings

How long should a safety meeting last?

You've got lots of flexibility here to schedule your safety meetings. But this goes hand in hand with the frequency of the meetings. If you're doing a monthly safety meeting, then consider a 30-minute safety meeting as the minimum. If you are going with a weekly schedule, then they can really be effective even as short as 5 minutes long.

The key is finding the right length of time where you can communicate a valuable piece of information, keep the attention of the team, and have the majority of them continue to see value in the meeting.

If the meeting constantly goes long, then you'll lose the team because they'll be thinking of how much work they still have to do.

2. Safety Meetings

What should we talk about at a safety meeting?

Everything! Safety meetings should be used to cover these things:

- 1) specific OSHA rules that are simple enough to communicate but can be used to meet a compliance need
- 2) specific job-site rules that may be customer or location specific
- 3) recent injuries, property damage incidents, or near-miss incidents where you can quickly explain what happened and how to avoid it (if you can't explain how to avoid it then don't bring it up in a safety meeting)
- 4) specific company rules that have changed or are stricter than the OSHA rules
- 5) regional or local issues such as weather-related hazards

Almost anything can turn into a short useful safety meeting.

2. Safety Meetings

Where can I find information to share in a safety meeting?

The internet does have a lot of safety information and there are sites that archive safety toolbox talks and tailgate meetings. Start your search with these terms: toolbox talks, safety topics, safety meetings, tailgate safety meetings, etc.

The one resource that we always recommend is OSHA.gov or your state OSHA program. Although the free resources are a good place to start you can get yourself in trouble by following an outdated toolbox talk or tailgate meeting template. OSHA rules can change, and you can't afford to train your team on the wrong thing.

Every meeting is an investment, and you really need to have confidence that what you're putting in front of your team is accurate, timely, legal, and compliant.



Compliance Training

3. Safety Compliance Training

What is safety compliance training?

Safety compliance training is a really important step along the way to having a good plan for safety. Even if you are holding weekly safety meetings you may not be 100% in compliance with specific OSHA regulations.

In other words, your team may be doing a great job but if OSHA shows up on your site and asks you specifically for your "Fall Protection" training documents you need to be able to show them right away.

Compliance training for safety always ties back to a very specific OSHA regulation or standard and you want to make sure that you've checked that box. Because if you don't, then you're putting yourself at risk for an OSHA citation and penalty. And more importantly you may be putting your team at risk for serious injuries or worse. A few examples of compliance training include - **HazCom, Fall Protection, Fire Safety, Forklifts, and Confined Spaces.**

3. Safety Compliance Training

How do I find out what safety compliance training is required?

This is where it can become overwhelming without some good direction. If you prefer DIY, we'll recommend you start with OSHA.gov. But we want to give you a good start and a specific resource to look at so go here:

<https://www.osha.gov/Publications/osh2254.pdf>

This document lists specific OSHA standards and rules that require safety training. What you'll need to know is what industry you serve - for example Construction or General Industry (manufacturing). And then you'll have to consider the specific types of work your team does and the hazards they encounter.

If your teams encounter specific hazards on the job, then they need compliance training on those hazards.



Incident Investigations

4. Incident Investigations

What's the difference between an accident and an incident?

To understand what an incident is or really why safety professionals and investigators often use this term “incident” as opposed to accident we should look at the definition of that word.

An accident is usually described as an unforeseen and unplanned event that results in injury or damage of some sort. The problem with using the word accident when it comes to safety issues is that you will find that **most safety accidents could have been foreseen, predicted in advance, and there could have been a plan to prevent it from happening.**

In other words, most safety accidents aren't accidents at all because you or the people involved knew that it could have happened. So as a safety investigator it is best to call it an incident until you get down to the facts and rule out all the preventable root causes.

4. Incident Investigations

What types of incidents do I have to investigate?

Injury incidents that require anything more than basic first aid are an absolute must to investigate.

Second to those, you need to investigate any motor vehicle incident that occurs even if it didn't result in injury if it happened in one of your company vehicles.

In addition, your insurance company will probably ask you to investigate any property damage incidents that happens on one of your sites that they may have to cover on your behalf.

4. Incident Investigations

Do I have to investigate all incidents or accidents at work?

The simple answer to this question is yes. The reason why is a little more complicated because you need to keep in mind that there are both State and Federal rules that require you to report very specific information about injuries. Information that requires you to find out much more than the who, what, and where of a workplace injury. You need to investigate so that you can also explain why an incident occurred, how it happened, and how you will prevent it and a very specific question in accident investigation - **what was the root cause**.

***TIP:** the person on your team assigned to write up the reports on incidents should have some basic training on root cause investigation and corrective/preventive action.*

4. Incident Investigations

What does an incident investigation form look like?

Incident investigation forms and reports can get very complicated. But any employer or organization should always start with what Federal OSHA requires and build on that. The reason is that if you fall under OSHA rules then you'll be required to have collected at least the minimum information they require on their incident report form. So, start here – find the OSHA 301 form at this link:

<https://www.osha.gov/recordkeeping/forms>

This link will take you directly to OSHA's Injury and Illness Incident Report Form 301 and the directions on how to fill it out. Once you've reviewed that you can should contact your local state Workman's Compensation office and request their injury/incident form. Most states have a specific form used to report claims and it will provide great information on what details to gather during an investigation.

4. Incident Investigations

What do I do with the results of the incident investigation?

This really depends on the severity of the incident, if anyone was injured, and if insurance companies are involved. The reason is that an incident investigation may result in nothing more than some papers filed in a folder to full blown OSHA investigations and lawyers. Anything is possible and the best you can do is document everything so that you've got good incident investigation information to share with your lawyers and insurance representatives.

***TIP:** Start a filing system that is easy to understand and keep it organized. This can be in a filing cabinet at the office or in digital files on your company's network. If you save your incident reports on a computer, make sure those files are backed up to a hard drive, to the cloud, or to another file saving network (like Dropbox, Google Drive, or OneDrive).*



5. Job Inspections

Do I have to inspect my job sites?

Yes. OSHA has a specific rule that says on construction projects you need to periodically inspect the job site.

1926.20(b) Accident prevention responsibilities. **1926.20(b)(1)** *It shall be the responsibility of the employer to initiate and maintain such programs as may be necessary to comply with this part.* **1926.20(b)(2)** *Such programs shall provide for frequent and regular inspections of the job sites, materials, and equipment to be made by competent persons designated by the employers.*

What is a job site?

A job site is anywhere you may be doing business, providing a service, installing a product, building something, manufacturing something, or fabricating material to go out to the field.

5. Job Inspections

How often do I need to inspect job sites?

OSHA states that frequent and regular inspections have to take place, but it doesn't specifically define how often because it really depends on the size of the company, how many jobsites a company may have, and the complexity or dangers of the work involved.

OSHA has left it up to the employer to make that decision, so they have the flexibility to experiment and determine a plan that works for their teams.

Our recommendation for most construction companies is to start with a weekly safety inspection of 10% of their active jobsites. For shops, warehouses, or light manufacturing facilities at least a monthly safety inspection is a great starting point.

5. Job Inspections

What should I look for during a safety inspection?

Safety Inspections, just as safety training, have to be tailored to the company, the potential hazards employees could be exposed to, and the goals of the safety program. However, in deciding where to start safety inspections and what to look for, a great idea to consider is OSHA's top ten most frequently cited standards. Essentially, looking at what OSHA finds problems with most frequently could give you ideas on how to tailor your inspection program. Here is a quick link to the site: <https://www.osha.gov/top10citedstandards>

Fall Protection, Hazard Communication, and Personal Protection (PPE), typically make it to the Top 10 list every year and these categories should be included in your safety inspections.

5. Job Inspections

What do I do with the job inspections forms once they are done?

The biggest advice any consultant should give you is that if you are doing safety inspections and **if you find any hazard, issue, or unsafe condition – you need to resolve it.** The worst situation you could create is to have a pile of safety inspections that show you find hazards but never actually correct them. That will be trouble for you with OSHA, your employees, and lawyers. Always be certain to document both good and bad findings and document what was fixed, corrected, or eliminated as soon as you've actually done that.

TIP: Start a filing system that is easy to understand and keep it organized. This can be in a filing cabinet at the office or in digital files on your company's network. If you save your inspection forms on a computer, make sure they are backed up to a hard drive, to the cloud, or to another file saving network (like Dropbox, Google Drive, or OneDrive).

OSHA's Form 300 Log of Work-Related Injuries and Illnesses

Note: You can type input into this form and save it. Because the forms in this recordkeeping package are "fillable/writable" PDF documents, you can type into the input form fields and then save your inputs using the [free Adobe PDF Reader](#). In addition, the forms are programmed to auto-calculate as appropriate.

Attention: This form contains information relating to employee health and must be used in a manner that protects the confidentiality of employees to the extent possible while the information is being used for occupational safety and health purposes.

Year 20

U.S. Department of Labor
Occupational Safety and Health Administration



Form approved OMB no. 1218-0176

Please Record:

- Information about every work-related death and about every work-related injury or illness that involves loss of consciousness, restricted work activity or job transfer, days away from work, or medical treatment beyond first aid.
- Significant work-related injuries and illnesses that are diagnosed by a physician or licensed health care professional.
- Work-related injuries and illnesses that meet any of the specific recording criteria listed in 29 CFR Part 1904.8 through 1904.12.

Reminders:

- Complete an Injury and Illness Incident Report (OSHA Form 301) or equivalent form for each injury or illness recorded on this form. If you're not sure whether a case is recordable, call your local OSHA office for help.
- Feel free to use two lines for a single case if you need to.
- Complete the 5 steps for each case.

Establishment name XYZ company

City Anywhere

State MA

Step 1. Identify the person

Step 2. Describe the case

Step 3. Classify the case

Step 4.

Step 5.

(A) Case no.	(B) Employee's name	(C) Job title (e.g., Welder)	(D) Date of injury or onset of illness (e.g., 2/10)	(E) Where the event occurred (e.g., Loading dock north end)	(F) Describe injury or illness, parts of body affected, and object/substance that directly injured or made person ill (e.g., Second degree burns on right forearm from acetylene torch)
RESET 1	Mark Bagin	Welder	5 / 25 month / day	basement	fracture, left arm and left leg, fell from ladder
RESET 2	Shana Alexander	Foundry man	7 / 12 month / day	pouring deck	poisoning from lead fumes
RESET 3	Sam Sander	Electrician	8 / 5 month / day	2nd floor storeroom	broken leg, fell over box
RESET 4	Ralph Boccella	Laborer	9 / 17 month / day	packaging department	back strain lifting a box
RESET 5	Jarrod Daniels	Machine opr.	10 / 23 month / day	production floor	dust in left eye
RESET			/ / month / day		
RESET			/ / month / day		
RESET			/ / month / day		

SELECT ONLY ONE circle based on the most serious outcome:

Remained at Work			
Death (G)	Days away from work (H)	Job transfer or restriction (I)	Other recordable cases (J)
<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Away from work (K)	On job transfer or restriction (L)
12 days	15 days
days	30 days
7 days	30 days
3 days	days
days	days
days	days
days	days

Illness					
(M) Injury	Skin disorder (1)	Respiratory condition (2)	Poisoning (3)	Hearing loss (4)	All other illnesses (5)
<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Be as specific as possible. You can use two lines if you need more room.

Revise the log if the injury or illness progresses and the outcome is more serious than the original record for the case. If you delete a case or want to delete the original entry in the log, use the "Reset" button in the form. Do not delete the case entry from the log using the Reset button.)

Choose ONLY ONE of these categories. Classify the case by recording the most serious outcome of the case, with column G (Death) being the most serious and column J (Other recordable cases)

Note whether the case involves an injury or an illness.

OSHA Logs

6. OSHA Logs

What is an OSHA Log?

An OSHA log is a form created by OSHA specifically designed for companies to log or document in writing all work-related injuries and illnesses.

What qualifies as a work-related injury?

Basically, any injury or illness should be considered work-related if something happened on the job and either caused or contributed to the injury or even aggravated a pre-existing injury or illness. Most incidents on the job that result in an injury or illness will be considered work-related by OSHA unless they meet specific exemptions explained in the OSHA regulations.

6. OSHA Logs

How do I get copies of the OSHA logs?

OSHA has a link here for everyone to access electronic versions of the mandatory OSHA logs. You can also download them in a Microsoft excel spreadsheet format.

<https://www.osha.gov/recordkeeping/forms>

How do I fill out an OSHA log?

The instructions to fill out the OSHA logs are included right along with the forms in the packet you can download at the link provided above.

Take some time reading through these instructions and follow the directions carefully.

6. OSHA Logs

What do I do with the OSHA Log?

Keep OSHA Logs on file at your business for as long as you are in operation. Incidents that are on your OSHA logs may need to be reviewed by you, your legal team, or your insurance representatives sometimes years after they happen. It is safest to keep these files for as long as you are in business. Electronic versions can be a very good option and a great back-up.

Post a summary of the OSHA logs in a place where your employees can see them each year from February 1 of the year following the year covered by the records until April 30.

OSHA has created a really question and answer site you can look at here:

<https://www.osha.gov/laws-regs/regulations/standardnumber/1904/1904.32>

A woman with long, dark, wavy hair, wearing a black blazer over a light pink shirt, is shown in a professional setting. She is holding a black telephone receiver to her ear with her right hand and looking down at a laptop screen. The background is a bright, out-of-focus office environment with a grey vertical element on the right.

OSHA Reporting

7. OSHA Reporting

What do I need to report to OSHA?

Many companies, large and small, get confused when it comes to what is required to be recorded and what is required to be reported to OSHA. On one hand you can think of the recordkeeping as just writing and filing all injuries. Reporting, on the other hand, is notifying OSHA about certain injuries.

Here is the short answer to what needs to be reported and when:

- All employers are required to notify OSHA when an employee is killed on the job or suffers a work-related hospitalization, amputation, or loss of an eye.
- A fatality must be reported within 8 hours.
- An in-patient hospitalization, amputation, or eye loss must be reported within 24 hours.

7. OSHA Reporting

What happens when I report an injury to OSHA?

Reporting fatalities, amputations, eye-loss injuries, and hospitalizations to OSHA cause a type of work-flow to be initiated within OSHA.

OSHA will forward the injury notification to the local office closest to where the incident took place. The local office will review and decide based on the severity of the injury to call you for more information. If the injury is a fatality, OSHA will begin a formal investigation process. *The only exception to this that we have found is when the fatality happens on a public highway or road. In those cases, we have seen that OSHA does not send out an investigator.* If the injury does not result in a fatality, then OSHA typically has a representative call the employer and request them to provide their own investigation report and findings. Based on the initial report from the employer OSHA will then decide if they are going to initiate an inspection process of the job site or company location.

7. OSHA Reporting

Will I get a citation for reporting an injury to OSHA?

We really want to answer this by saying no, absolutely not... but we can't. The truth is that when it comes to OSHA and citations every situation is unique. Simply reporting an incident to OSHA should not result in a citation but if OSHA investigates the incident and finds a violation, they may very well issue a citation. However, if an employer does not report the injury to OSHA and they find out about it later then you are almost guaranteeing that OSHA will issue you a citation for failure to report the injury to them. They take that very serious!

The best recommendation we can provide is to follow the reporting regulations, do your own investigation, and report as required. If during the course of your investigation, or OSHA's investigation, you find anything that can be improved to prevent that type of injury from happening again, then work to get it done. It will end up improving your safety program, preventing future incidents, and possibly avoiding future OSHA investigations or citations.

7. OSHA Reporting

How do I report a fatality or severe injury to OSHA?

1. Call the nearest OSHA office
2. Call the OSHA 24-hour hotline at 1-800-321-6742 (OSHA)
3. Report online

For more information, check out OSHA's page on reporting which includes a list of Frequently Asked Questions, a link to find your nearest OSHA office, and a link to the serious event reporting online form.

<https://www.osha.gov/report>

Weeklysafety.com provides safety meeting topics, toolbox talks and tailgate safety topics, so your team is focused, productive and accident-free.

To learn more, visit us at



We provide everything you need for successful, OSHA-compliant safety meetings.

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