

Getting Started with Workplace Health and Safety

**An Introduction to Workplace Health and
Safety Policies, Procedures and Evaluation**

Work Safe
VICTORIA

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Policies, Procedures and Evaluation*



VICTORIAN WORKCOVER AUTHORITY

Contents

The Getting Started with Workplace Health and Safety Series	3
Managing Health and Safety in your Business	4
The Legal Framework	5
Health and Safety Policies and Procedures	7
Preparing a General Health and Safety Policy	9
Specific Policies and Procedures	11
Evaluating Health and Safety Performance	20
Sources of Further Information	27
WorkSafe Victoria Offices	28

The Getting Started with Workplace Health and Safety Series

Successfully managing health and safety in the workplace relies on commitment, consultation and co-operation. Everyone in the workplace needs to understand the need for health and safety, what their role is in making the workplace safer, and how they can fulfil their responsibilities and duties.

The four booklets in this *Getting Started* series provide an introduction to:

- ▶ workplace consultation
- ▶ hazard management, workplace inspection and selecting a health and safety consultant
- ▶ workplace health and safety roles and responsibilities, training, information and records; and
- ▶ workplace health and safety policies, procedures and evaluation.

These booklets are written for employer representatives, health and safety representatives, health and safety committee members and other employees. They explore the key features of effective health and safety management arrangements, and are designed to show that getting started on improved health and safety in the workplace is not difficult.

Successfully managing health and safety in the workplace relies on commitment, consultation and co-operation. Everyone in the workplace needs to understand the need for health and safety, what their role is in making the workplace safer, and how they can fulfil their responsibilities and duties under the *Occupational Health and Safety Act 1985*.

The Act provides a framework for consultation between employers and employees on health and safety. Effective consultation can make a real difference to workplace health and safety management. Change for the better is not difficult to achieve when employers and employees work together and co-operate to find solutions to problems.

Setting up a hazard management program — to identify workplace hazards, to assess the risks those hazards pose to the health and safety of people in the workplace, and to introduce measures to control those risks — is the basis for a planned, systematic approach to making sure workplaces are better places to be. Consultation about health and safety, and developing policies and procedures which are backed up by information and regular training will have a real effect on reducing *and preventing* injuries at work.

These four booklets can help establish a health and safety management program. Other publications, including a *Guide to the Occupational Health and Safety Act 1985*, and practical guidance on getting started on health and safety is available from WorkSafe Victoria offices listed at the end of this booklet.

Managing Health and Safety in Your Business

Health and safety is part of your business, just like production and quality. Health and safety affects production, quality, and your financial results. So it should be managed in the same way as other aspects of your business.

To run a successful business you need to manage the quality of your product or service, and the productivity of your business. You also need to manage the health and safety of the people who work for you. The way you do these things is determined by your management system.

Your management system may be an informal system of registers, diaries, instructions, workbooks and your memory. Or it may be a formal, completely documented system following the *Australian–New Zealand Standard AS/NZS 4801 — Occupational Health and Safety Management Systems: Specification with Guidance for Use*. Further guidelines on establishing a safety management system can be gained from the *Australian Standards for Quality Management and Quality Systems (ISO 9000 Series)*. The more complete and orderly your system is, the easier it is for you and your employees to follow. It will also lead to better results for your business.

Health and safety is part of your business, just like production and quality. Health and safety affects production, quality, and your financial results. So it should be managed in the same way as other aspects of your business. To manage health and safety effectively you need to:

- ▶ set your health and safety objectives, and plan how you will achieve them;
- ▶ decide who is responsible for getting things done;
- ▶ give those responsible the skills and resources to do the job; and
- ▶ regularly check that you are meeting your objectives.

During this process it is important to write down what you are doing, to involve the people in your workplace in the process, and to keep checking to see it is all working. Documenting your system, consulting with employees and evaluating and modifying your system means your system will be more effective.

The long term success of workplace health and safety plans depends on the commitment of everyone in the workplace. You have a good chance of getting this commitment if management consults with employees. **Section 31(2)(c)** of the *Occupational Health and Safety Act 1985* states employers are required to consult with health and safety representatives about work activities and practices whenever practicable. Employees have valuable on-the-job experience and they will be carrying out the plan. They can help successfully work health and safety into the day-to-day running of the business.

The Legal Framework

The Occupational Health and Safety Act sets out employers' general duty of care, with specific sections on the development of policies and procedures.

The *Occupational Health and Safety Act* 1985 and associated regulations set out a legal framework for workplace health and safety. Specific sections of the Act apply to the development of policies and procedures, and employers' general duty of care under the *Occupational Health and Safety Act* is to: "... provide and maintain so far as is practicable for employees a working environment that is safe and without risks to health" (**Section 21**).

"Practicable" involves doing what can be done in the light of:

- a) the severity of the hazard or risk in question;
- b) the state of knowledge about that hazard or risk and any methods of removing or mitigating that hazard or risk;
- c) the availability and suitability of ways to remove or mitigate that hazard or risk; and
- d) the cost of removing or mitigating that hazard or risk.

Section 21(2) sets out a number of ways to meet this general duty. These include:

- ▶ providing and maintaining safe plant and systems of work;
- ▶ arranging safe systems of work when working with plant and substances;
- ▶ providing a safe work environment;
- ▶ providing adequate welfare facilities; and
- ▶ providing adequate information on hazards, as well as instruction, training and supervision to employees, to enable them to work safely and without risks to health.

Section 21(3) states that employers have the same responsibility to independent contractors and their employees who are working at the workplace on matters under the employer's control.

Section 21(4) provides that employers are also required to, as far as practicable:

- ▶ monitor the health of their employees;
- ▶ keep information and records relating to the health and safety of their employees;
- ▶ employ or engage suitably qualified persons to provide advice on the health and safety of their employees;
- ▶ nominate a person with an appropriate level of seniority to be the employer's representative when health and safety issues arise or when health and safety representatives carry out their functions under the Act;
- ▶ monitor conditions at any workplace under their control and management; and
- ▶ provide health and safety information to their employees, in appropriate languages, including the names of persons to whom an employee may make an inquiry or complaint in relation to health and safety.

Section 22 requires employers to ensure that the health and safety of members of the public is not adversely affected by their business activities.

The *Occupational Health and Safety Act 1985* also sets out an approach to developing policies and procedures where a health and safety committee is established (**Section 37(4)(b)**). One of the functions of a committee is to: "... formulate, review and disseminate (in such languages as are appropriate) to the employees the standards, rules and procedures relating to health and safety which are to be carried out or complied with at the workplace."

In other words, the *Occupational Health and Safety Act* anticipates policies and procedures will be developed for your workplace. It also anticipates your health and safety committee will be involved in developing and implementing them.

What health and safety management arrangements do you have in place now?

To find out how your current health and safety performance measures up, some key questions need to be asked:

- ▶ Do you know if you are complying with the health and safety laws affecting your business?
- ▶ Do you have copies of the legislation, regulations, codes of practice and Australian Standards which apply to your workplace?
- ▶ Are there arrangements in place for consultation between management and employees or their nominated representatives?
- ▶ Are there any elected health and safety representatives? Are they trained?
- ▶ Is there a health and safety committee? Is it functioning?
- ▶ Do you have a general health and safety policy? Is it in writing?
- ▶ Do you have policies to deal with particular specific health and safety issues in your workplace?
- ▶ Is there a systematic written procedure for identifying hazards and assessing risks in your workplace?
- ▶ Has a workplace health and safety inspection program been introduced? Is it working?
- ▶ Are health and safety aspects always considered when operating procedures and work instructions are developed?
- ▶ Is health and safety always considered when planning, designing or purchasing new equipment or processes?
- ▶ Do you have written operating procedures for all normal operations?
- ▶ Do new and transferred employees receive instruction in your health and safety policies and procedures?
- ▶ Is there a procedure and timetable for reviewing workplace procedures?
- ▶ Do you have procedures for emergencies and first aid?
- ▶ Do you know how well you perform in health and safety?
- ▶ How do you know if you are meeting your own standards for health and safety?
- ▶ Is health and safety performance taken into account when assessing the performance of supervisors and managers?
- ▶ What do your employees think of your safety standards?
- ▶ Are all injuries, ill-health and incidents recorded, investigated, reported (if required) and analysed for trends? Is this information made available to managers and employees?

Health and Safety Policies and Procedures

Specific policies and procedures address particular issues or hazards.

They are administrative measures to control workplace hazards and should be used together with other hazard control measures to eliminate or reduce the risk of workplace illness or injury.

Why should you have health and safety policies and procedures?

Health and safety policies and procedures are part of a framework for effective health and safety management. A general health and safety policy states management's intention to provide a safe and healthy workplace, and states the health and safety goals of a workplace. It should also demonstrate the employer's acknowledgment of their legal duties and their intention to voluntarily comply with those duties.

Specific policies and procedures address particular issues or hazards. They are administrative measures to control workplace hazards and should be used together with other hazard control measures to eliminate or reduce the risk of workplace illness or injury.

An objective of the *Occupational Health and Safety Act 1985* is the elimination, at the source, of risks to the health, safety and welfare of persons at work. Regulations supporting the *Occupational Health and Safety Act* require the **elimination** of risks as the first step in risk control. For example:

- ▶ **Elimination** — eliminating toxic substances, hazardous plant or processes which are not necessary to a system of work.

If risks cannot be eliminated, occupational health and safety legislation requires that they be **reduced** so far as is practicable by using one or more of the following methods:

- ▶ **Substitution** — substituting a toxic substance, hazardous plant or process with one known to be less harmful to health. Substitution is not only a preferred control method, it may also be the

least expensive. For example, substituting a less hazardous material to control a vapour hazard makes more sense than installing an expensive ventilation system.

- ▶ **Isolation** — enclosing or isolating a hazard such as a toxic substance, plant or process from employees, to eliminate or reduce the risk of injury or illness. Using a fume cupboard or sound enclosure booths are examples of moving a hazardous process away from the main work area (and other employees) to a site where emissions can be controlled.
- ▶ **Engineering controls** — changing processes, equipment or tools, for example:
 - ▷ machine guards and machine operation controls;
 - ▷ ventilation to remove chemical fumes and dusts, and using wetting down techniques to minimise dust levels;
 - ▷ changing layout of work levels to minimise bending and twisting during manual handling.

If a risk to workplace health and safety remains after the above methods have been used, **administrative controls** should be applied or, if these are still not adequate, **personal protective clothing and equipment** worn. These methods of risk control are not preferred because the source of the risk is not eliminated or reduced.

- ▶ **Administrative controls** — changing work procedures to reduce exposure to existing hazards. For example:
 - ▷ reducing exposure to hazards by job rotation;

- ▷ limiting the number of employees exposed to the hazard by limiting access to hazardous areas.

▶ **Personal protective clothing and equipment**

— devices and clothing which provide individual employees with some protection from hazards. An effective personal protective clothing and equipment system requires considerable effort by the employer to ensure that:

- ▷ proper protective devices are selected;
- ▷ employees are individually fitted;
- ▷ proper instruction on the need for, and use of, personal protective clothing and equipment is provided;
- ▷ standards are enforced; and
- ▷ an effective system of cleaning and maintenance is devised.

Administrative controls and protective clothing and equipment may provide interim solutions in a planned program to eliminate or reduce a particular risk, or they may be used in addition to other control methods.

Specific health and safety policies and procedures should provide clear direction or instruction by which workplace hazards will be identified, and the risks assessed and controlled by the measures described here. A formal policy or procedure can ensure hazards are dealt with in a structured and agreed manner, rather than in response to a crisis.

More information about hazard identification, risk assessment and risk control is in the *Introduction to Hazard Management* booklet in the *Getting Started with Workplace Health and Safety* series.

Who's responsible for developing policies and procedures?

Developing policies and procedures is a management responsibility. Consultation with employees however, is very important. **Section 31(2)(c)** requires employers to consult with health and safety representatives on work practices whenever practicable. Consultation helps to create policies that can be understood, will work, and will be followed.

Developing procedures does not make employees responsible for hazards at work. The responsibility for ensuring the workplace is safe, and that work procedures are followed remains a responsibility of the employer. This responsibility is set out in Part III of the *Occupational Health and Safety Act 1985*.

There may be times when you need to call on specialist assistance from within or outside your organisation to help develop policies and procedures. The *Introduction to Hazard Management* booklet also includes a section on selecting a consultant.

Preparing a General Health and Safety Policy

Preparing a health and safety policy is an important practical step towards providing and maintaining a work environment that is safe and without risks to health.

Why do you need a general health and safety policy?

A properly prepared health and safety policy clearly states health and safety objectives and the organisation's commitment to improving health and safety performance. It also acknowledges the employer's legal responsibilities.

Preparing a health and safety policy is an important practical step towards providing and maintaining a work environment that is safe and without risks to health.

How do you prepare a general health and safety policy?

Successfully preparing a policy requires consultation. Elected health and safety representatives, nominated management representatives responsible for health and safety and employees can all contribute to ensure an effective health and safety policy.

Health and safety policies will vary from one organisation to another, and should reflect the particular needs and operation of the organisation preparing the policy. The policy should also reflect the relevant requirements of the *Occupational Health and Safety Act 1985*.

The suggestions in this booklet can be used as a starting point when preparing or updating your health and safety policy.

What should the policy include?

The policy statement should indicate, in clear and simple terms, your company's health and safety objectives. It should describe the arrangements to achieve those objectives, including the allocation of functions and roles. It should be signed and dated by the chief executive or equivalent of your organisation.

Issues that should be covered include:

- ▶ senior management commitment to the provision and maintenance of a working environment which is safe and without risks to health;
- ▶ the integration of that commitment into all organisational activities;
- ▶ a commitment to establishing the functions and roles of all people in the organisation involved in maintaining workplace health and safety;
- ▶ accountability of all levels of management for implementing health and safety practices and procedures;
- ▶ the importance of consultation and co-operation between management and employees for effective translation of objectives into action;
- ▶ training in, and communication of, health and safety practices and procedures; and
- ▶ commitment to regular monitoring and review of the policy and its effectiveness.

What is an effective policy?

To be effective, a health and safety policy should detail the organisational arrangements for identifying and controlling health and safety issues. It should also lay the basis for employee involvement, the setting of goals, action plans, and policy review.

Those preparing the policy should ensure that:

- ▶ there is a plan to implement the policy throughout the organisation;
- ▶ the contents of the policy show those involved in its preparation understand the hazards and needs of the workplace, and have worked out the detailed arrangements needed to fulfil the policy;
- ▶ concern for health and safety is integrated into every level of the organisation;
- ▶ the policy functions in the same way as production or financial policy;
- ▶ roles and functions are clearly defined and assigned;
- ▶ methods of ensuring tasks are done are included;

- ▶ proper procedures and programs to support the policy are established, maintained and reviewed;
- ▶ there is adequate provision of financial and other resources to support the policy's direction; and
- ▶ there is recognition of the benefits of consultation between management, health and safety representatives and employees.

Regardless of your organisation's size, a written statement of health and safety policy demonstrates senior management's determination to ensure high standards of health and safety.

A health and safety policy also provides a vital means of support for managers, supervisors or employees if they are faced with a conflict between production demands and the demands of safety.

Health and safety should not take second place. Preparing a policy, renewing and updating it in the light of experience and workplace changes allows the organisation to promote and maintain the momentum of the health and safety program in the workplace.

The policy should demonstrate concern for the health and safety of employees, and most importantly, management commitment to translating that concern into effective action.

Specific Policies and Procedures

Policies and procedures need to work. They need to be tested thoroughly before they are implemented. Employees engaged in an activity must clearly understand the relevant health and safety policy and be able to follow written procedures where appropriate.

Specific workplace health and safety policies and procedures are only one part of controlling risks to health and safety. As administrative control measures, they are low on the risk control hierarchy and should be used with other more effective measures such as elimination and substitution.

What is the difference between policies and procedures?

A **policy** is a statement about an issue in the workplace and says what the business intends to do about the issue. A policy describes:

- ▶ the desired standard;
- ▶ a specific objective to meet;
- ▶ a timeframe;
- ▶ arrangements for reviewing the policy;
- ▶ management's commitment to fulfilling the policy;
- ▶ steps to be taken to implement the policy; and
- ▶ what is expected of all employees in relation to the particular issue.

If the workplace is going to be successful in following that policy, all employees affected by the issue must know about and understand the policy.

A **procedure** sets out step-by-step instructions on how to deal with an activity in the workplace. Activities which may have specific procedures developed include:

- ▶ working in confined spaces;
- ▶ resolving issues;
- ▶ evacuations;
- ▶ the overall work flow, from materials coming into the workplace, to the final product going out;
- ▶ workplace inspections; or
- ▶ administrative activity like purchasing.

Where there are workplace hazards, and risks to health and safety, the procedure sets out what to do at every stage of the activity.

Procedures need to work. They need to be tested thoroughly before they are implemented. Employees engaged in an activity must clearly understand and be able to follow any relevant written procedure.

How do you establish specific health and safety policies and procedures?

There are five steps to establishing specific health and safety policies and procedures:

- Step 1: Identify workplace hazards and issues.
- Step 2: Collect information about the hazardous activity or issue.
- Step 3: Prepare the policy or procedure.
- Step 4: Implement the policy or procedure.
- Step 5: Review the policy or procedure and make changes if required.

Step 1: Identify workplace hazards and issues

The need for specific health and safety policies and procedures can be determined through the process of hazard identification, risk assessment and risk control. This process is described in detail in the *Introduction to Hazard Management* booklet in the *Getting Started with Workplace Health and Safety* series.

Regardless of the type of work, many workplaces have specific policies which support their general health and safety policy and relate to all employees. Common policies include:

- ▶ non-smoking policy;
- ▶ policy on use of drugs and alcohol; and
- ▶ housekeeping policy.

If there are other particular health and safety issues or hazards in your workplace, you may need to develop a policy which deals with them. For example, if there is a lot of manual handling required in the workplace, then a specific written policy makes the employer's intentions clear. It also defines roles in preventing and dealing with manual handling injuries.

To work out what policies and procedures you might need, the most useful information is available within your workplace:

- ▶ consult with health and safety representatives. They are trained in health and safety legislation, principles and practice, and their input to policies and procedures will be based on their knowledge of health and safety and the workplace;
- ▶ talk with employees. They know about the work processes because they work with them daily;

- ▶ look at accident and incident statistics. They often indicate serious existing or potential hazards; and
- ▶ check the minutes of the health and safety committee. They will provide a record of issues needing attention.

What procedures do you need?

You may not be able to develop a procedure for every activity in the workplace — at least not in the short term. Start with those which have the most significant impact on health and safety. These might be specific activities such as handling hazardous substances, or they may be general processes such as purchasing equipment. In some cases you will have to start from scratch. In other cases you can build on a health and safety standard which must be followed for a particular procedure.

There are many aspects of your work environment where written procedures will help prevent workplace illness and injuries and control hazards at their source. Some examples where written procedures may be required are:

- ▶ specific workplace hazards
 - ▷ identification and assessment of the risks
 - ▷ risk control
 - ▷ reporting hazards;
- ▶ issue resolution;
- ▶ consultation on proposed change;
- ▶ workplace inspections;
- ▶ investigating incidents and issues, with corrective actions;
- ▶ reactive and response activities such as:
 - ▷ first aid and medical emergencies
 - ▷ reporting illness, injury
 - ▷ reporting incidents and dangerous occurrences;

- ▶ administrative activities such as record keeping and purchasing;
- ▶ legal responsibilities in relation to:
 - ▷ contractors
 - ▷ visitors
 - ▷ injury records
 - ▷ health monitoring
 - ▷ complying with new regulations which apply to the workplace.

You will need to look at all the activities in your workplace to assess the needs and the priorities for policies and procedures. Taking stock of the activities in your workplace will be part of your overall management and you can use this information in other aspects such as working out training needs and allocating roles or functions.

You will also need to be aware of changes in the workplace and how these could affect your need for policies or procedures. Changes to the plant, substances or the equipment you use, the layout of your workplace, or to regulations and codes of practice could create a need for new or revised procedures and policies.

To determine priorities, it will help to ask:

- ▶ Is the activity or hazard causing frequent or severe incidents or ill health?
- ▶ Is the hazard or activity new to the workplace?
- ▶ How important is the issue to employees?

Step 2: Collect information about the activity

You need accurate and up-to-date information to ensure each policy or procedure contains the most effective preventive strategy. Some information you need will be technical. Other information will be practical and help with implementation.

What sort of information do you need?

The type of information you need is determined by the activity concerned and whether you are developing a policy or a procedure. In general, you need information which will tell you or allow you to work out:

- ▶ the causes of the hazard and factors creating the risk;
- ▶ relevant legal standards or requirements;
- ▶ possible control measures; and
- ▶ workplace factors which will affect implementation of the policy or procedure.

Where do you find the information?

There are many different sources of information. Much of the information is available in your workplace, but some will only be available externally. Possible sources include:

- ▶ health and safety representatives
- ▶ employees
- ▶ regulations, standards, codes of practice
- ▶ WorkSafe Victoria field officers and education officers
- ▶ investigation reports
- ▶ consultants' reports
- ▶ your records, knowledge and experience
- ▶ product and equipment specifications
- ▶ WorkSafe Victoria's website (www.workcover.vic.gov.au) and other government websites
- ▶ industry organisations
- ▶ publications and journals on health and safety.

Health and safety representatives and employees will probably be your most important information source. Without their contribution management will not be able to ensure the policy or procedure is realistic.

Occupational health and safety legislation and regulations set out the minimum requirements you need to meet. Codes of practice provide information on how to go about reaching the legislative standards.

Inspection or consultants' reports about conditions in the workplace will also provide useful information about hazards and existing control measures. They can help make sure policies and procedures reflect the circumstances actually existing at the workplace. Finding out about the work environment also means health and safety policies and procedures can be prepared which are consistent with other aims of the workplace. You need to be aware of all the possible problems or alternatives while an activity is being carried out so they are all covered in the procedure.

Health and safety records will help identify the degree of risk posed by a hazard and the effectiveness of existing control measures. If you do not already have a good system for managing health and safety records, the *Introduction to Health and Safety Responsibilities, Roles and Functions* in the *Getting Started with Workplace Health and Safety* series can provide useful guidance on establishing a recording system.

Product and equipment specifications provide technical data on hazards and suitable control measures, and Material Safety Data Sheets (MSDS) are a good source of detailed information about chemical risks and their control.

WorkSafe Victoria field officers will assist all parties involved in workplace health and safety with relevant information, specialist advice and education activities, such as:

- ▶ providing practical, accessible and customised guidance material on hazard identification, risk assessment and risk control, and
- ▶ promoting the establishment of health and safety committees, and effective workplace communication, consultation and issue resolution procedures.

Other organisations in your industry may have already developed control measures for hazards. You can learn from their experience. They might tell you which control measures they use, how the measures were implemented, if they worked and how they have been changed if required. You could also check your industry association, or the *SHARE Solutions Manual* for this type of information.

Step 3: Prepare the policy or procedure

It is very important to consult with employees while preparing policies and procedures. Employees will be involved with implementing any new arrangements, and because of their day-to-day "hands on" role, they are likely to know whether the proposed arrangements will work. If the people who are affected by the procedures or policies are involved in their development, it is also likely that their commitment to making those policies and procedures work will follow.

A draft policy or procedure could be prepared by management, a working group, the health and safety committee, health and safety representatives, health and safety officers or an experienced supervisor for comment. The health and safety committee should review the document before it is tested.

How do you write hazard policies?

A policy provides a broad statement of intent regarding a health and safety hazard or issue in the workplace. A policy should be a statement of commitment, goals or standards, and responsibilities, and it should also set out how it will be implemented. A policy should include the following sections:

- ▶ a statement of the purpose of the policy;
- ▶ a statement of the legal duty of management;
- ▶ an expression of the organisation's commitment to controlling the hazard or issue at its source;
- ▶ an outline of how the hazard or issue will be controlled, including resources to be provided and a timeframe for action;
- ▶ the roles and accountabilities of relevant stakeholders, particularly managers and supervisors; and
- ▶ a description of how the policy will be implemented.

How do you write procedures?

A procedure is very specific, with step-by-step directions for an activity, including the steps to take if a problem occurs.

Health and safety procedures can often be integrated into procedures covering other aspects of the workplace. For example, a purchasing procedure should include an assessment of the health and safety implications of equipment. This means health and safety issues are dealt with before purchase, saving time and money.

Sometimes a specific health and safety procedure, such as a first aid procedure, needs to be established. The procedure should be:

- ▶ clear and understandable by all employees who are affected; and
- ▶ thoroughly tested before use.

The point of any procedure is to make an activity repeatable, reliable, traceable, safe and without risks to health.

A procedure could include the following sections:

- ▶ a statement of the purpose of the procedure;
- ▶ the standards required, from a policy, or code of practice for example;
- ▶ the specific steps to be followed which will ensure achievement of standards and control measures;
- ▶ roles and accountabilities; and
- ▶ a clear statement of any actions to be taken when the procedure is not followed.

Procedures can be written in a range of formats such as work instructions, flow charts or guidelines.

Step 4: Implement the policy or procedure

Policies can be used to provide information about particular health and safety goals. They are a statement to all employees and therefore need to be communicated to all employees.

Procedures are used in a variety of ways. They are used for instruction, supervision and hazard control activities, including investigations. Because procedures must be understood before they can be implemented, an important part of implementation is working out the best way to communicate the information to employees. Implementing a procedure may also require resources and changes to existing administrative procedures.

How do you inform employees?

Everyone should be aware of the policies and procedures which have been developed for the workplace. Employees directly involved will need detailed knowledge of all relevant policies and procedures. You could do this by:

- ▶ explaining policies and procedures during induction training;
- ▶ including information on policies and procedures in refresher training; and
- ▶ filming and presenting information in a video.

Section 21(4)(e) of the *Occupational Health and Safety Act 1985* requires employers to provide workplace health and safety information in appropriate languages.

You could also:

- ▶ test persons covered by the policy or procedure before allowing them to undertake work (e.g. contractors);
- ▶ make up posters or laminated pocket cards for all employees;
- ▶ use illustrated flow charts for complicated or long procedures; or
- ▶ prepare a health and safety manual for use by all employees.

What support systems do you need?

Implementing a policy or procedure may require new equipment, revised maintenance procedures or different reporting systems. For example, a policy to reduce incidents involving forklift trucks may require a change to the workplace layout. If pedestrians and vehicles have to be separated, you may need to paint lines, set up barriers and ban forklifts and pedestrians in certain work areas at the same time. The implementation process should include these changes.

What training will be required?

Changing the way people perform their jobs requires training or instruction. Training may need to occur before the policy or procedure is introduced. Training may be part of the policy or procedure or it may need to occur on a regular basis to ensure the policy or procedure continues to be followed. Your policy or procedure should specify what training will be undertaken as part of their implementation. The *Introduction to Health and Safety Responsibilities, Roles and Functions* booklet in the *Getting Started with Workplace Health and Safety* series can help you identify and meet the training needs in your workplace.

How do you test the policy or procedure?

In some cases, you might want to introduce a policy slowly, or introduce it in stages before implementing it throughout your workplace. To do this, choose “pilot” work areas in which to test the policy. These areas could be chosen on the basis of:

- ▶ the work area being representative of other areas of the workplace;
- ▶ the severity of relevant hazards in the area; and
- ▶ the willingness of employees and management in the area to participate in a test.

You should certainly test procedures before implementation and work through the procedure with experienced employees before it is implemented.

Step 5: Review and make changes if required

Policies and procedures need to be reviewed regularly. You need to make sure they are achieving their purpose, they are still relevant to your workplace, and they are providing value for money. You will want to know how well they achieve your goals for hazard identification or risk control. You also need to know whether the policies and procedures are supporting your preventive strategies. Make a plan or a timetable for reviewing every procedure in your workplace.

Review and evaluation are essential in the development of policies and procedures. As the circumstances at your workplace change and greater knowledge about hazards is gained, you should work through the hazard identification, risk assessment and risk control procedure. Your policies and procedures take account of these changes.

If you do not regularly review and evaluate your policies and procedures, inadequacies will only be revealed when an issue is raised by the employees, or when there is an incident in the workplace. It is important to review and evaluate to find out whether:

- ▶ the policy has achieved its purpose;
- ▶ the procedure works;
- ▶ the policy is being followed;
- ▶ the procedure is always followed;
- ▶ new hazard control measures are available or required; or
- ▶ new policies are needed to cope with changes to regulations, processes or the workplace.

You evaluate a policy or procedure in the same way you evaluate any other activity or part of your management system.

The key steps to follow are to:

- ▶ start with what you aimed to achieve when you prepared the policy or procedure;
- ▶ decide what things would show you whether the policy or procedure is achieving the aims or not;
- ▶ collect information on these performance indicators;
- ▶ analyse the information and work out changes to the policy or procedure; and
- ▶ rework your policy or procedure, following the steps in this booklet.

Where does reviewing a policy or procedure start?

Start with the aims you had when you developed the policy or procedure. In Step 1 you identified the needs for specific health and safety policies and procedures in your workplace. You will need to review your needs regularly, and whenever there is a change to your workplace. Changes such as a new process, substance, regulation, or moving or expanding your premises should be analysed to see if they introduce new hazards. Your policies and procedures should be modified to reflect these changes and new policies or procedures may be required.

The objectives in your policy should be clearly stated. You will be checking to see if these aims are being reached. For example, if you have developed a policy to stop smoking in the workplace, you will be checking to see how well this aim has been achieved.

Procedures are usually more straightforward. You will be checking to see if:

- ▶ the procedure is always followed without difficulty;
- ▶ the procedure is the most effective one for the activity or hazard; and
- ▶ the procedure results in the activity being carried out safely and without risks to health.

What things will indicate policy or procedure effectiveness?

Policies and procedures can be tested quite easily if they have been written clearly and specifically.

Because policies aim to improve health and safety in a workplace, you need to look at measures of health and safety to see if the policy is working. This could include incident and dangerous occurrence statistics. For example, if you have a manual handling policy, you would look at incident, injury and near-miss records in your workplace. This would include checking specific information such as body location of the injury or illness, work area, and time of the incident.

Some issues are not so easily measured. You could look through the record of issues raised by health and safety representatives, minutes of the health and safety committee meetings, or other record of issues raised and resolved (or not resolved) to determine how well a policy is achieving its aims.

Where there is an end result that can be checked, it is usually obvious if a procedure is being followed or not. For example, a day supervisor has to follow the following procedure: "Inspect the work area with the health and safety representative to identify hazards every week using a given checklist. Take any action possible to control hazards immediately. Report to the area manager". This procedure could be evaluated by looking at the checklists and reviewing action taken.

Sometimes you may need to watch an activity to see if the procedure is being followed. It is often more difficult to check whether it is being done every time. You may have to devise a test, or plan an evaluation measure when you are preparing the procedure. For example, if a procedure contains a step which cannot be directly checked, like dipping a tank before opening a valve, then you could put a measure into the procedure. Perhaps a requirement such as having to fill out a check slip which is handed to a second operator could be included.

What information should be collected?

To evaluate a particular policy or procedure, you collect information about how it is being followed, and any results that might indicate how successful it is. Collecting this information may involve:

- ▶ a survey of employees who are affected by the policy or procedure;
- ▶ a review of health and safety committee minutes or issues book and issues raised by health and safety representatives;
- ▶ reports from your health and safety information system;
- ▶ a review of health and safety activities over the previous year; or
- ▶ a walk through the workplace to see how activities are carried out.

If the information you collect shows a policy or procedure is not working, then you need to know why. For example, if employees must follow a procedure for the safe maintenance of machinery, and an inspection of the workplace some time later finds they do not follow the tag-out/lock-out steps, then it would seem the procedure is not working. You need to know why it is not being followed to create a workable procedure.

What is the next step?

The next step is to analyse the information and work out changes for the policy or procedure. In most cases you will be able to see, or the employees will be able to tell you, if there is something wrong with a policy or procedure. In some cases, the problem might not be so obvious, or there may be several factors affecting the way the policy or procedure is being followed. Where the information shows a policy is not working, you can start by looking at each part of the policy:

- ▶ Is the purpose or objective clear?
- ▶ Is it relevant?
- ▶ Are the standards realistic?
- ▶ Is the time frame for achieving the objective reasonable?
- ▶ Is the organisation committed to the objective?
- ▶ Is the suggested approach workable?
- ▶ Are the resources available?
- ▶ Are the responsibilities being fulfilled?
- ▶ Is the implementation going according to plan?

You can also look at the policy as a whole and the steps taken to implement it.

If your information shows you a procedure is not working, or is not being followed, you will have to work out why this is happening. Perhaps:

- ▶ there was not sufficient information, instruction or training for employees;
- ▶ there was an unforeseen event not covered in the procedure;
- ▶ the work organisation did not support the procedure being followed;
- ▶ many of the employees were not literate and this was not taken into account when preparing written procedures;
- ▶ it was not practical; or
- ▶ the procedure did not match the workplace health and safety policy or the actual issue, problem or activity.

Once you have information about why the procedure is not being followed, or is not working, you can suggest changes that could make it work. You should look at the procedures which are working to get ideas for changes to the ones which have not worked. It is important to know why some procedures do work, so you can include these features in new or changed procedures.

When you have found out why a policy or procedure is not working, you can decide to:

- ▶ develop a new procedure;
- ▶ determine whether you need to change work practices;
- ▶ revise the policy or procedure so that it meets your needs; or
- ▶ change your standards — perhaps there are new legal requirements or new control measures requiring higher standards.

Evaluating Health and Safety Performance

Once you have set up prevention strategies such as policies and procedures, you need to make sure they continue to work to keep your workplace safe and without risks to health. Evaluation is an important part of effectively maintaining health and safety in your workplace.

Why should you evaluate health and safety performance?

The aim of evaluation is to check how well you are going towards achieving your stated health and safety objectives or goals. You use the information you get from your performance evaluation to make changes to the way you manage health and safety. This enables you to get closer to achieving your goals.

Once you have set up prevention strategies such as policies and procedures, you need to make sure they continue to work to keep your workplace safe and without risks to health. Evaluation is an important part of effectively maintaining health and safety in your workplace.

Measurement of your health and safety performance is the basis for refining and improving your health and safety management system. You need to measure and analyse how well you are meeting your legal requirements as well as your own business objectives. Then you will be able to make improvements and evaluate again. This part of the booklet shows you how to evaluate your health and safety performance.

How do you evaluate health and safety performance?

There are five steps to evaluating health and safety performance:

Step 1: Know what your health and safety objectives are.

Step 2: Develop performance measures which indicate achievement of your objectives.

Step 3: Collect information on your measures of effectiveness.

Step 4: Analyse the results and decide upon improvements.

Step 5: Implement changes and start again.

Step 1: Know what your health and safety objectives are

The first step of evaluation is having an objective or goal. In health and safety management, your goals will be to:

- ▶ meet the legal requirements or standards applying to your workplace; and
- ▶ ensure the workplace, as far as practicable, is safe and without risks to health.

You can evaluate a single part of your health and safety management system (e.g. training) or the entire system.

How do you identify your objectives?

The employer's primary objective is to meet legal obligations to provide and maintain so far as practicable, a working environment that is safe and without risks to health for employees. This is stated in **Section 21** of the *Occupational Health and Safety Act 1985*.

To evaluate your health and safety performance, you will need to look at what you are doing to achieve your objectives, and how well you are doing it. For example, you might have an overall objective which aims to "... foster a healthy, safe, satisfying and non-discriminatory work environment". Your policy might state this will be achieved through:

- ▶ effective management with commitment and personal involvement at all levels of the organisation;
- ▶ work planning and control, so hazardous situations and conditions are avoided;
- ▶ facilities, equipment, education and training, to ensure healthy and safe working conditions and methods; and
- ▶ teamwork and effective two-way communication as an integral part of every job.

To evaluate your system against these objectives, you firstly have to look at what programs or strategies have been developed to meet the objectives. For example, are you providing training? If you are, you need to evaluate how well the training is contributing to "healthy and safe working conditions and methods".

Other more specific objectives relate to strategies, commitment, roles and functions, and the environment within the workplace. Some examples are:

- ▶ *Strategic goals*
 - ▷ health and safety strategies will be developed annually to improve health and safety performance; and
 - ▷ health and safety systems and programs will continually be reviewed, upgraded and monitored to improve standards and performance.
- ▶ *Commitment and responsibility goals*
 - ▷ personal commitment to health and safety will be demonstrated at all levels;
 - ▷ a high level of health and safety awareness will be fostered at all levels;

- ▷ all managers will have responsibility for the health and safety of employees under their management;
 - ▷ all employees will take the care they are able for their own, and their work mates health and safety; and
 - ▷ specific, defined, responsibilities will be clearly understood by all employees.
- ▶ *Work environment goals*
 - ▷ health and safety practices and procedures, and the work environment, will be regularly reviewed and revised;
 - ▷ formal consultation and communication with health and safety representatives and employees in all health and safety matters will occur through health and safety committees, team briefings and management involvement and commitment;
 - ▷ all incidents and near misses will be reported, investigated and corrective action taken as a priority; and
 - ▷ the purpose of an investigation will be to determine the cause of the incident to prevent future occurrences.

Part of the evaluation against these goals will be to audit whether the arrangements have been made as proposed. For example, are health and safety strategies developed each year?

Evaluation will also include assessing how well the arrangements are working to achieve the objectives. In the example provided, you would look at each individual strategy and evaluate how well it is achieving the aim of improving health and safety performance.

How do you meet legal requirements and standards?

Many legal requirements will be straightforward. For example, all employers are required to report serious incidents, and to keep records relating to the health and safety of employees.

If you handle hazardous materials, you may be required to keep a dangerous goods manifest, or to monitor levels of employee exposure to chemicals. There are standards for the work environment and exposure levels for employees that must be monitored and achieved. These include atmospheric contaminants, noise, radiation and so on. The legal requirements you must satisfy depend on the work processes, substances, plant and equipment in your workplace.

Other legal requirements are management strategies for providing a workplace that is safe and without risks to health. For example:

- ▶ providing adequate information on hazards, as well as instruction, training and supervision to employees, to enable them to work safely;
- ▶ providing adequate welfare facilities; and
- ▶ advising employees of the details of the resolution of an issue.

These requirements may be the basis for developing your overall or specific objectives for the management of health and safety in your business.

These requirements are examined in more detail in the *Introduction to Health and Safety Responsibilities, Roles and Functions* booklet in the *Getting Started with Workplace Health and Safety* series.

Step 2: Develop performance measures which indicate achievement of your objectives

Step 2 involves the development of measures which will indicate progress towards achieving your aims and objectives. These measures may be stated in your objectives, or built into the health and safety programs you establish in your workplace. Whatever indicators you choose to measure your performance, you should put them in place at the beginning, when you establish the objective, plan or program. Look for long-term as well as short-term measures of your performance.

You will need measures to look at your overall management of health and safety, and to look at individual strategies and programs.

To evaluate your overall management system, or any specific aspect of it, you will need to use a range of measures. Short term measurements, long term indicators, quantitative measures, qualitative measures as well as measures of timeliness will be required.

You need to choose measures that will tell you about the program or activity you are evaluating. For example, if your objective is to reduce the number of lost time injuries, then you can use your injury and illness records to measure if this is being achieved, and by how much (quantitative measures).

If your policy states that “a high level of health and safety awareness will be fostered at all levels”, then you will have to work out what would show you this is being achieved. You may have to look at health and safety committee minutes, at a record of issues raised, or you may talk to employees about their awareness of health and safety (qualitative measures).

If you wish to evaluate your aim “to plan and control work so hazardous situations and conditions are avoided”, then you need to look at, and follow, aspects affecting this strategy. For example:

- ▶ your system for workplace inspections, corrective actions, reporting and follow-up (hazard identification, risk assessment and risk control);
- ▶ your system for developing and reviewing work procedures and instructions;
- ▶ your investigation and follow up of accidents, incidents and near-misses;
- ▶ your injury and illness records; and
- ▶ your system for checking all new and changed plant, equipment, substances or processes in the workplace.

What are some short-term measurements?

Some short term measures include:

- ▶ an assessment of whether your plans are being implemented;
- ▶ the proportion of health and safety grievances which were resolved successfully at shop-floor level; and
- ▶ any reduction in the number of health and safety grievances.

What are some long-term indicators?

The main aim of your health and safety management system is to reduce work related injury and illness. Some of the changes that take place in your workplace to achieve this goal may not show up in the short term. These may include:

- ▶ injury and illness rates;
- ▶ incidence of gradual onset injuries; and
- ▶ the hidden costs of injury and illness.

What are some other quantitative measures?

These are measures you can get from your health and safety records. They could include:

- ▶ the number of incidents;
- ▶ the number of employees trained;
- ▶ the number of work procedures developed or reviewed; and
- ▶ the number of hazards identified and eliminated.

What about qualitative measures?

Qualitative measures give you more information about the numbers, and are helpful in analysing the success and failure of particular strategies. Qualitative measures in the workplace could include:

- ▶ the types of issues being raised by employees and health and safety representatives;
- ▶ employees' level of awareness of the health and safety policy;
- ▶ how the health and safety performance is being taken into account in the performance assessment of supervisors and managers; and
- ▶ evidence that management is leading by example.

What are some measure of timeliness?

An important aspect of effectiveness is whether the activity happened in a timely way. Measures of this could include:

- ▶ whether the training timetable is being followed;
- ▶ whether the timetable for implementing the strategies is being observed;
- ▶ the response time for corrective action on inspections; or
- ▶ maintenance requests being handled promptly.

When should you plan your measures of effectiveness?

You need to plan the measures you will use when you set up programs or strategies. For example, you may need to establish ways of collecting records about injuries and illnesses. This could include setting up a first aid register as well as a procedure to make sure Workplace Injury and Illness Recording forms are completed.

Step 3: Collect information on your measures of effectiveness

Once you have decided what measures to use, you need to decide how this information will be collected, how often it will be collected, and who will collect it. These decisions will depend on the program or strategy being evaluated and the types of measures you are collecting.

How do you collect the information?

You will probably use a checklist when you are auditing the system, or measuring if certain activities have been completed against a fixed time schedule. Some possible questions to ask are:

- ▶ Do the injury and illness recording procedures meet the requirements of the *Occupational Health and Safety Act 1985*?
- ▶ Are all incidents, illness and injury, and near misses:
 - ▷ recorded
 - ▷ investigated
 - ▷ reported if required
 - ▷ analysed for trends, and
 - ▷ reported to employees?

If you are measuring performance against specified targets, for example reducing numbers of injuries, you could use information from your health and safety records. This could include reports on:

- ▶ the frequency of incidents and dangerous occurrences;
- ▶ average lost time; and
- ▶ costs.

If you are evaluating the effectiveness of your information and communication strategy, you could collect qualitative information from:

- ▶ discussion with health and safety representatives and employees;
- ▶ health and safety committee minutes;
- ▶ issues raised and resolved logbook; or
- ▶ interviews, questionnaires or observations.

In all cases, information should be obtained by speaking directly to the people doing the task which is being evaluated.

How often should you collect information?

How often you collect this information will vary according to the nature of the measures, and the system or strategy you are evaluating. For example, some indicators relating to training will need to be assessed at the end of every training course. The overall performance of your health and safety management system may only need to be assessed annually.

Whatever your timetable, you need to continue to collect information on the measurements regularly, so trends and changes can be identified.

Who should collect the information?

Information can be collected on the health and safety performance of a work area or location. It may also be collected on a health and safety system operating throughout the workplace. In both cases the role or function of collecting the information should be clearly allocated.

In specific locations, supervisors or managers can collect information on the areas under their control. Small workgroups or teams can collect information on their own area. The manager whose role or function includes implementing a health and safety system or plan in that area may also do the evaluation. They would do this in the same way they would evaluate and report on sales or costs in their area.

The health and safety committee and health and safety representatives should be involved in evaluation. This may include a role in collecting and providing information. In larger organisations you may want or need external assistance to evaluate overall policy or management systems.

Step 4: Analyse the results and decide upon improvements

Measurement is not an end in itself. You need to analyse these records. You need to understand the information so it can be used to identify improvements to both your health and safety management system as well as particular strategies.

The measurements you have collected will show whether a strategy is achieving its objective, or if performance is up to the standard you set. If you have not achieved your objective, then you need to look at the information you have collected to determine the reasons. This will help you to arrange improvements or changes to the objective or strategy.

If performance is not up to your standard in a particular area, you may choose to develop a strategy to improve it.

What should you do if a strategy is not working?

If a strategy is not working, there is a number of questions to ask:

- ▶ Was the objective realistic and achievable?
- ▶ Is the objective relevant to current technology and values?
- ▶ Was the strategy implemented as planned?
- ▶ Was there adequate training, information and understanding of the strategy?
- ▶ Were there resources available to implement the strategy?
- ▶ Did work organisation allow the strategy to work?

- ▶ Was responsibility for implementing the strategy allocated?
- ▶ Are the responsibilities understood?
- ▶ Did the information you collect accurately measure performance of the strategy?

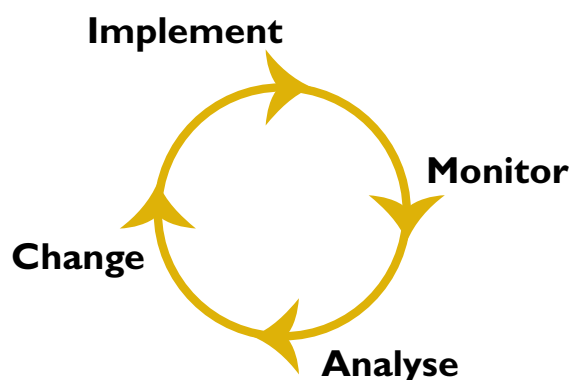
Use the information you get from this analysis to fine tune your strategies, to reset your standards and to identify areas of health and safety needing more systematic management.

Step 5: Implement changes and start again

Once you have identified improvements to your health and safety system, you should make the results known and implement corrective action. Follow-up corrective action must be taken promptly to demonstrate management commitment to health and safety.

New or improved strategies should be implemented and then the evaluation process will begin again, using any lessons, mistakes and achievements to help the process.

Effective evaluation is a continuous cycle of action, analysis and change.



To sum up ...

This booklet has shown that preparing policies and procedures is not hard. It has also shown that policies and procedures do not need to be complicated documents. An effective policy or procedure, based on controlling hazards at their source, will ensure effective health and safety management and efficient allocation of resources. In short, effective policies and procedures can help ensure your management of health and safety contributes to the overall success of your enterprise.

Preparing written agreed policies and procedures has valuable rewards. Rather than dealing with every health and safety hazard on a crisis basis, everyone has clear guidance on what to do. Instead of ad hoc, time-consuming responses, the workplace will be able to concentrate on solving the issues before they become problems. Day-to-day management will improve and handling unusual occurrences will be more efficient. If your management of health and safety improves, so does your organisation's success.

Health and safety performance evaluation is a simple, cost effective process. It will show you if you are spending time and money to good effect. It should be a regular and continuous process with the results always feeding back into your health and safety plans.

The Victorian legislative framework and performance-based regulations emphasise the systematic management of health and safety as the primary strategy for preventing injury and illness at work. Quality management systems provide the opportunity to include health and safety in business management. This means there is a greater emphasis on workplaces being able to measure their own performance and use those measurements to drive continuous improvement.

Sources of Further Information

Occupational Health and Safety Act 1985

Guide to the Occupational Health and Safety Act 1985

Available from your local WorkSafe Victoria office.

Other books in this *Getting Started with Workplace Health and Safety* series

Available from your local WorkSafe Victoria office.

SHARE Solutions Manual

Available from the National Occupational Health and Safety Commission.

Victorian WorkCover Authority Library

Phone 9628 8260.

WorkSafe Victoria field officers

Contact your local WorkSafe Victoria office.

Employer associations

Unions

OHS consultants

WorkSafe Victoria Offices

WorkSafe Victoria

WorkSafe Victoria offers a complete range of health and safety services:

- ▶ emergency response
- ▶ advice, information and education
- ▶ inspections
- ▶ licensing and certification
- ▶ publications.

For further assistance and information, contact any of the WorkSafe Victoria offices listed below.

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