

## Developing Effective Safety Rules and Procedures

### Summary

*Safety rules and procedures are not only the requirements for regulatory compliance; they are also a reflection of the philosophy, values, and management commitment to the loss control program and employee safety. How they are developed, communicated, and enforced is critical to the loss control program's success. This Data Sheet addresses the often overlooked, rule-making process and offers tips on the fundamentals. It discourages the practice, common among many organizations, of adopting – essentially verbatim - so-called “canned programs” and “sample” materials from outside sources. This practice undermines the joint responsibility of management and employees for safety. It can result in rules and procedures that do not reflect the hazards of the operations, are illogical and at odds with existing policies, and which cast doubt on the safety commitment of top management..*

The rules and procedures by which an organization conducts itself say a lot about the organization. How they are **developed, communicated, and enforced** says even more. The process should represent the organization's best management practices. This is especially true of safety rules and procedures which affect and benefit the entire organization. To be effective, these rules and procedures must:

- Reflect the hazard exposures that are present in the operations.
- Be logical.
- Clearly communicated and understood – by all parties, and
- Enforceable.

The best way to meet these criteria is to encourage the involvement of the key parties in the organization – management and employees - in the preparation and development.

Each party has broad, fundamental duties that are at the core of all safety rules and procedures. Management must identify workplace hazards and control them. They must **issue** and **enforce** safety rules and procedures that will help create a reasonably safe workplace. Employees are responsible for reasonably protecting themselves and fellow employees from injury by following those rules and reporting unsafe processes, procedures, and conditions that management must address.

### Developing and Drafting Rules

Ideally, the writing of rules should be assigned to a team or teams, depending on the size and complexity of the organization, and the nature of the hazards involved. The collective knowledge, experience and judgement of several people - with diverse but appropriate backgrounds - working together generally results in a more balanced, accurate, and complete set of rules and procedures. In many organizations, the preliminary drafts of safety-related rules and regulations are developed by a safety committee.

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Once the responsibility for the development of rules and procedures has been established the next step is to target the hazardous exposures that must be addressed. The following should be considered:

1. ***Loss exposures of the organization.*** – The team(s) should review available loss records. From a safety standpoint, these would include the OSHA Form 200 (or the new 300) logs, first reports of injury, vehicle accident reports, accident investigations, loss analysis reports, and job hazard analyses. In the broader context of *loss control*, all documents that would help identify major risk factors and loss causes associated with the facility layout, equipment, operations and work processes, products and services should be looked at.
2. ***Applicable regulatory statutes and standards.*** – All federal and state OSHA requirements, applicable local statutes, other standards and regulations from government agencies – (DOT, EPA, MISHA), should be studied and incorporated.
3. ***Suggestions and recommendations, and other input*** from experienced employees and supervisors.
4. ***Suggestions from loss control /safety professionals.*** – Loss control professionals affiliated with the organization, including insurance loss control professionals and technical consultants are excellent resources.

When the rules and procedures are put into writing, the following guidelines apply:

1. ***Is the rule or procedure logical?*** - Does it make sense? Does it apply to a condition or correct a situation that exists and affects the organization? Establishing a rule to call **911** in the event of an emergency makes no sense if the service does not exist in that area.
2. ***Is it consistent*** with other policies, rules or procedures? – Does it set up a potential conflict for the people affected?
3. ***Is it enforceable?*** - Rules that ***are not enforced*** are not rules. Rules that ***cannot be enforced*** impair the effectiveness of other rules and procedures, and undermine the credibility of a loss control program.
4. ***Is the rule easy to understand?*** - Short sentences, simple words, and commonly known expressions help achieve understanding. Is it in the right language?
5. Whenever possible, ***phrase the rules as “positive statements”***. State what ***should be done***, rather than what is prohibited.
6. All rules and procedures ***should be reviewed by another group*** of supervisors and employees for clarity of understanding.

## Enforcement

All employees must clearly understand that compliance with rules and procedures is a ***requirement*** of their position, ***not an option***. Safety rules are not effective unless they are supported by top management, and are both ***routinely*** and ***consistently*** enforced. Since supervisors are assigned that responsibility, it is important that they be thoroughly familiar with all rules and procedures, and follow or model them at all times. Their visible example that the rules apply to all employees coupled with a policy of

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intervention and enforcement as soon as an infraction is noted will reinforce the program. Enforcement must also take place as soon as the rule or procedure is in place. Too often safety rules are overlooked or not enforced until there is an accident.

## Rules and Regulations

Safety rules and procedures typically fall into one of two groups:

**General issues** – These apply to all employees, regardless of department or job description. These include, as the name implies, general rules or expectations:

- Follow all federal, state, and local regulatory laws and workplace regulations.
- Observe all established company-specific safety rules and procedures.
- Report unsafe working conditions and /or work practices.
- Report losses and incidents.
- Cooperate with loss investigations.

They usually cover topics like fire protection and life safety, security concerns, no smoking policies, drug-free workplace testing, etc.

**Specific issues** - These include rules and procedures required by statutes(federal, state, and /or local ordinances and regulations, such as OSHA's standards on Hazcom, permit-required confined space, and DOT requirements. They may also cover company-specific issues, industry or process-related concerns, and departmental operation needs, such as the use and care of specialized personal protective equipment, workplace inspections, and any other work practices that are deemed essential to worker safety or production.

Regardless of type, the important thing is that all workers should understand their role in the organization's safety process **and** have a voice in shaping the rules. All employees should receive their own copy of the rules, and additional copies should be posted on bulletin boards as constant reminders. A good practice is to have employees sign a receipt that states that the rules have been explained to them, and that they understand and agree to obey them. The signed statement should be placed in their personnel file.

## Follow-Up

Setting rules and procedures is not a one-time event. Like so many activities in loss control and safety, the process is an on-going cycle that involves a monitoring or follow-up step to verify effectiveness.

For more suggestions, contact the loss control professionals of Harleysville Insurance.

*The information and suggestions contained in this data sheet have been developed from sources believed to be reliable. However, we accept no legal responsibility for the correctness or completeness of this material or its application to specific factual situations.*

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