# Safety and Health Plan

# Tips and Considerations

**Applicability.** This Safety and Health Plan is designed for smaller business organizations that need a general safety and health plan to protect workers from injury and illness. The basic elements of this Plan include:

* Communicating safety concepts and procedures to employees
* Job hazard analysis
* Hazard prevention and control
* Emergency response (general)
* Employee training
* Safety meetings
* Accident investigation
* Recordkeeping

The Plan can be used as a starting point to build a comprehensive safety program that includes multiple topics. You must add detailed plans for multiple topics (e.g., lockout/tagout, hazard communication, confined spaces).

**Assign responsibilities.** Decide who in your company will be given responsibility and authority to manage the safety and health plan. It could be the plant manager or a ranking member of the management team, an engineer, a safety manager or director, human resources or personnel manager, or other staff member.

**Survey current conditions.** Gather as much information as possible about current conditions at your workplace and about work practices that are already part of your workplace safety and health program. This can be done through a job hazard analysis (JHA). Procedures for conducting the JHA are outlined in the sample Plan. This information can help you identify workplace problems and determine what is involved in solving them. The person responsible for safety and health and/or a professional occupational safety and health consultant should assess your workplace.

**Review and analyze.** After all the facts are gathered, look at how the information about your workplace corresponds with the applicable safety and health regulations and company policies.

**Develop corrective actions.** Use the JHA forms to create specific, written descriptions of problems and solutions. A good action plan has two parts:

1. An overall list of major changes or improvements needed to make the Plan effective. Assign each item a priority and a target date for completion, and identify the person who will monitor or direct each action.
2. Take each major change or improvement listed and work out a specific plan for making that change. Write out what you want to accomplish, the steps required, who would be assigned to do what, and when you plan to be finished. This part of the action plan helps you keep track of program improvement so that details do not slip through the cracks.

**Review and update the Plan.** Schedule a review (at least annually or more often if needed) to look at each critical component of the Plan to determine what is working well and what changes, if any, are needed.

**Use the support materials.** In order to complete the Plan for site-specific needs, attach copies of the forms and guidance material recommended at the end of the sample Plan. They are available at the safety.blr.com website. Follow the procedures outlined in the material for collecting site-specific information and formulate your own safety practices. Use the forms to study your hazards and likely emergencies, the types and varieties of jobs and work tasks at your facility, and determine how to respond to problems.

**Seek consultation.** If you need help with the development of your site-specific Plan, contact the free OSHA consultation service in your state for assistance. Each state’s workplace safety and health program and, in some cases, a state college or university system, administers the service. The services are free of charge, confidential, and conducted only at the request of the business employers. No penalties are assessed for violations discovered during a consultation. The state consultation programs are staffed with experienced safety consultants and industrial hygienists that conduct consultative surveys at industrial sites, construction projects, medical facilities, and other on-site locations.

**Review and incorporate state regulatory requirements.** This Plan is based on federal requirements and/or best practices. Some states have laws and regulations that are stricter than federal requirements and may affect how you customize this Plan. After reviewing the specific information for your state(s), you can edit the Plan accordingly.

# [Company name]

# Safety and Health Plan

Plan last updated: **[date]**

**Authority:** This Safety and Health Plan is authorized by **[name]**.

**Scope:** This Plan applies to all employees and other personnel working at **[name]** who may encounter health and safety hazards while performing their assigned work duties.

Safety and health plan

Table of Contents

[Policy statement 5](#_Toc381790675)

[Plan administration 6](#_Toc381790676)

[Plan review and update 7](#_Toc381790677)

[Safety communication 8](#_Toc381790678)

[Job hazard analysis (JHA) 8](#_Toc381790679)

[Activity selection 8](#_Toc381790680)

[JHA procedures 9](#_Toc381790681)

[Hazard prevention and control 10](#_Toc381790682)

[Corrective actions 10](#_Toc381790683)

[Additional safety and health programs 10](#_Toc381790684)

[Emergency response 11](#_Toc381790685)

[Disciplinary action 12](#_Toc381790686)

[Personal protective equipment 12](#_Toc381790687)

[Safety orientation and training 12](#_Toc381790688)

[List of training subjects 13](#_Toc381790689)

[Safety meetings 14](#_Toc381790690)

[Safety meeting documentation 14](#_Toc381790691)

[Accident investigation 14](#_Toc381790692)

[Injury to visitors 14](#_Toc381790693)

[Near-miss incident 14](#_Toc381790694)

[Accident investigation procedures 15](#_Toc381790695)

[Recordkeeping 16](#_Toc381790696)

[Supporting materials 17](#_Toc381790697)

Policy Statement

The personal safety and health of each employee of **[name]** is of primary importance. The prevention of occupational injuries and illnesses is of such consequence that safe working conditions and practices will be given precedence over operating productivity, whenever necessary.

We will maintain a safety and health program conforming to the best practices of organizations of this type. To be successful, such a program must emphasize injury and illness prevention on the part of both management and employees. It also requires cooperation in all safety and health matters, not only between management and employee but also between each employee and his or her coworkers. Only through a cooperative effort can a safety program in the best interest of all be established and preserved.

Our safety and health program will include:

* Providing physical safeguards from injury to the maximum extent possible;
* Striving to eliminate hazards through engineering controls, whenever possible;
* Conducting a program of safety and health inspections to detect and eliminate unsafe working conditions or practices, to control health hazards, and to comply with the safety and health standards for our jobs;
* Training employees in safe and healthy work practices;
* Providing personal protective equipment (PPE) required on designated jobs and instruction for its correct use and care;
* Developing and enforcing safety and health rules and requiring that employees cooperate with these rules as a condition of employment; *and*
* Investigating, promptly and thoroughly, accidents and near-miss situations to determine the root causes and to correct the problem in order to prevent recurrences.

Our objective is a safety and health program that will reduce injuries and illnesses and that surpasses the best experiences of other operations similar to ours.

Plan Administration

**[List the job titles and contact information for staff with safety and health responsibilities, and describe their responsibilities below the table.]**

|  |  |  |
| --- | --- | --- |
| **Function** | **Name/Department** | **Contact Information** |
| Plan administrator | **[name]** | Work phone:  Cell phone: |
| Job hazard analyst |  | Work phone:  Cell phone: |
|  |  | Work phone:  Cell phone: |
|  |  | Work phone:  Cell phone: |
|  |  | Work phone:  Cell phone: |
|  |  | Work phone:  Cell phone: |

**Plan administrator.** The Plan Administrator will ensure that safety and health hazard assessments, inspections, accident investigations, and employee training are conducted in a timely manner, and will be responsible for maintaining all records and other documentation related to such activities.

**Job hazard analyst.** The responsibility for conducting job hazards analyses (JHAs) rests with technically qualified safety personnel. Such personnel may be managers, supervisors, or consultants/contractors.

**Supervisors.** Supervisors will regularly monitor work areas and employee activities for unsafe incidents or equipment. The supervisor must take the initiative to make corrections where authorized to do so. If direct authority is not given, the supervisor must report any condition or employee practice that is likely to cause an accident. Every supervisor will ensure that:

* Work is not assigned that is hazardous or located in a hazardous area until all steps have been taken to provide for employee safety.
* All employees receive proper job instruction and are familiar with safety and health rules and regulations. Supervisors will make sure that new employees know all safety, health, and housekeeping rules to which their jobs are subject.
* Work areas will be examined frequently to ascertain that the work environment is safe and that employees are working in a safe manner.
* All safety and health deficiencies are corrected immediately and not repeated.
* Accidents are investigated and corrective action is initiated, where necessary.

**Employees.** Every employee has a specific role in our loss-prevention efforts. All employees will:

* Participate actively in the facility’s safety program and observe all safety measures.
* Report all accidents.
* Correct or report any safety hazard in his or her work area.
* Wear the proper PPE.

Plan review and update

This Plan will be reviewed **[frequency]** and updated as needed to reflect changes in the work and/or worksite conditions, and when injury or illness incidents warrant a review.

Safety Communication

Management ensures that all employees, including themselves, have clearly written safety and health responsibilities included within their job description, with appropriate authority to carry out those responsibilities. In addition, management ensures that all employees, including all levels of management, receive performance evaluations that include a written evaluation of the accomplishment of assigned safety and health responsibilities.   
  
Management ensures that all visitors to the site have knowledge of site hazards applicable to them and how to protect themselves against those hazards, including awareness of emergency alarms and procedures. Management also ensures that these visitors do not introduce hazards to the site that can be prevented or that are not properly controlled.   
  
Management ensures that at least several avenues exist for employee involvement in safety and health decision making and problem solving. These avenues may include serving on committees and ad hoc problem-solving groups, acting as safety observers, assisting in training other employees, analyzing hazards inherent in site jobs and how to protect against those hazards, and planning activities to heighten safety and health awareness. Management encourages employees’ involvement and devises appropriate recognition for outstanding employee participation.

Job hazard Analysis (JHA)

A JHA will be conducted for each work project and activity at **[name]**. Part of the purpose of the JHA process is to determine whether hazards exist through careful and regular examination of the location(s) and procedures involved in the project. If there is a project or activity that truly has no potential for employees to be exposed to hazards, the JHA will note that that is the case.

Activity selection

Personnel authorized by **[name]** to perform JHAs (i.e., JHA Analysts) will select the job(s), tasks, operations, or processes to be analyzed by reviewing:

* Injury and illness data
* Near-miss and incident reports
* New or modified work tasks, equipment, activities, or projects
* Employee safety process comments, surveys, and reports
* Regulatory requirements

A JHA will be conducted for any job or task to which one or more of the following apply:

* The job or process has a history of causing injury or illness.
* There have been many near misses for the job or task.
* The job or task has a potential for catastrophe (e.g., fire, explosion, large chemical release, massive equipment failure) if something goes wrong.
* A simple human error in the task could lead to serious consequences.
* The people performing the task have changed recently.
* The job or task itself has changed recently.
* The job or task is rarely performed.
* The job is complex enough to require written instructions.
* The job is done under a safety permit, such as a confined space entry permit or a hot work permit.

Initial JHAs will be scheduled by priority, starting with tasks or operations that pose the highest risk of severe injuries. Incident history as well as the potential for future accidents will be considered in making these risk determinations. Where accident or near-miss data are lacking, a review of the nature of the job and the equipment and/or materials being used will be conducted to help determine which jobs will receive a JHA. Employee participation in the JHA selection and implementation process will be encouraged and solicited. The analysis of methods to control hazards will incorporate regulatory requirements for each type of activity.

All JHA Analysts will consider the potential for chemical, explosion, electrical, ergonomic, fall, fire, heat and cold, machinery, noise, radiation, struck by/struck against, weather, and other relevant hazards and the likelihood of accidents in their operations when determining the priorities.

Management encourages employees to report hazards to their supervisor or **[name].** Employees will use the *Employee Report of Hazard* form for this purpose. See Attachment **[number]** for a copy of the *Employee Report of Hazard*.

JHA procedures

Following are the specific JHA procedures, listed in the order that they will be performed.

1. **List specific activities.** Make a list of specific activities that will be performed by employees at a particular location (work area or jobsite), for the use of machines and equipment, or for a specific process or project. Where projects are very broad and involve diverse activities, conduct a JHA for each activity.
   1. When a project or activity involves the same tasks and the same conditions over a wide range of work areas, a single JHA will suffice. For a simple activity, use Attachment **[number],** *Job Hazard Analysis Worksheet (simple)*.
   2. For an activity with complicated tasks that require multiple steps, use Attachment **[number],** *Job Hazard Analysis Worksheet (detailed)*.
   3. For activities that may require PPE, use Attachment **[number]**, *Personal Protective Equipment Hazard Assessment Certificate.*
2. **List each potential hazard.** Examine the hazards or potential hazards associated with each task or activity. Continue to use the worksheet or certificate used to list the specific tasks.
   1. Examine the location where the activities are or will be performed to determine if there are any apparent hazards, such as poor lighting, live electrical contacts, improperly stored materials or waste, adjacent operations that may affect the safe operation of the job under review.
   2. Interview appropriate personnel who are familiar with the job and/or equipment. The intent of the interviews is to determine the orderly sequence of job tasks and any perceived hazards.
   3. Observe, where possible, employees performing the actual job tasks. Thoroughly document the findings on the JHA worksheet.
   4. Review available literature associated with the particular activity for additional hazards, including safety data sheets (SDSs), equipment manuals, safety checklists, and existing health and safety plans and manuals.
3. **List corrective controls.** Once the hazards are identified, select the corrective controls that will be implemented to ensure employee safety and health, and list them on the appropriate worksheet or certificate. Corrective controls will be considered in the following order of precedence:
   1. Elimination—Removing the hazard or hazardous work practice from the workplace. This is the most effective control measure.
   2. Substitution—Substituting or replacing a hazard or hazardous work practice with a less hazardous one. As an example, substituting a less hazardous or toxic solvent for a highly flammable or carcinogenic solvent.
   3. Engineering control—If the hazard cannot be eliminated or substituted, an engineering control is the next preferred measure. This may include modifications to tools or equipment such as providing guards to machinery or equipment, or providing local exhaust or general ventilation to control emissions of toxic or hazardous gases, vapors, or particulates.
   4. Administrative control—Introducing work practices that reduce the exposure to workers. Some examples include limiting the amount of time a person is exposed to a particular hazard, demarcating exclusion areas and establishing physical access controls to prevent workers from entering hazardous areas, and ensuring proper training of employees.
   5. Personal protective equipment—Consider the use of PPE when other control measures are not feasible or as an interim control until one of the other described controls can be implemented. If PPE is required, complete Attachment **[number]**, *Personal Protective Equipment Hazard Assessment Certificate.*
4. **Certify and document the JHA.** Ensure that the JHA is reviewed and signed by an authorized Job Hazard Analyst, and shared with and signed by all of the employees who will be doing the work.
5. **Write safe job procedures.** Write a procedure for safely performing a job in a step-by-step format. Use clear, simple language. Make sure to specify safe work practices and any required PPE in your written procedures. Review the completed safe job procedures with workers who perform the task, and keep a written copy of the safe job procedures in a location that is easily accessible to workers.
6. **Review and modify the JHA as necessary.** Repeat the JHA process as necessary by evaluating new equipment or work processes, reviewing accident records, and periodically reevaluating the suitability of previously selected PPE and/or engineering controls.

Hazard Prevention and Control

Once the JHA has been conducted for each project or activity, corrective actions recommended in the JHA that are approved by management will be implemented. Supervisors will inform employees of the hazards and corrective actions, and conduct employee training before the commencement of related tasks.

Management will implement the following protective measures when hazardous conditions are present:

1. Correct the hazard when observed or discovered with administrative controls, engineering controls, training, and/or PPE.
2. Remove workers from an area where an imminent hazard is present that cannot be corrected without endangering employees or property.
3. Provide workers who will correct the hazard with appropriate hazard controls and PPE.

Management ensures that the worksite and all machinery will be maintained properly so that the workplace remains safe and healthy. If maintenance needs exceed the capability of the worksite employees, contract employees will be hired to do the work, and they will be screened and supervised to ensure they work according to the site’s safety and health procedures.

Corrective actions

**[Insert here any corrective actions identified in your JHA for primary or common hazards that do not require a separate safety and health program.]**

**[Modify or delete the following section on *Additional Safety and Health Programs,* as appropriate.]**

Additional safety and health programs

**[Name]** has determined that the following OSHA standards apply to the worksite. Individual safety and health programs for each of these standards will be written and implemented. Employees affected by these standards will be trained to follow the programs’ directions. These standards are:

**[Modify the list, as appropriate.]**

* Hazard Communication
* Hearing Conservation
* Bloodborne Pathogens
* Emergency Action Plan
* Personal Protective Equipment

See **[name]** for more information about these additional safety and health programs.

Emergency Response

**[Modify the following emergency response information as appropriate to your workplace.]**  
The site works with appropriate outside agencies, such as the fire department, the police department, and the hospital, to write emergency plans for all potential emergencies, including fire, explosion, accident, severe weather, loss of power and/or water, and violence from an outside source. Drills are conducted periodically so that all employees can practice the procedures for different types of emergencies. Each drill is evaluated by the drill planning committee, consisting each year of two managers or supervisors and two hourly employees who volunteer. This committee’s written report is posted **[location]**, and supervisors ensure that all employees know the results. When necessary, the emergency procedures are revised on the basis of the evaluation report.

Persons who require emergency care are transported by company van or community ambulance to the hospital, located **[distance to emergency services]**. Usually that trip can be made in less than 10 minutes. On-site during all shifts, designated persons fully trained in cardiac pulmonary resuscitation (CPR), automated external defibrillator (AED) use, first aid, and the requirements of OSHA’s Bloodborne Pathogen Standard are the first responders to any emergency. These persons are trained by **[name]**. One of these designated person’s safety and health responsibilities is to ensure that first-aid kits are stocked and readily accessible in the marked locations throughout the plant. Appropriate PPE is provided for the different types of accidents possible at the site. All emergency responders have been offered the hepatitis B vaccine.   
  
Management maintains a proactive occupational health program that provides for occupational health professionals from the local hospital to participate in worksite analyses to find and protect employees against all health hazards. This plan provides initial health screening for each employee, appropriate to the hazards with which each employee will be working, and for tracking any health changes in each employee through periodic physical examinations, post-exposure exams, and exit exams. Certified industrial hygienists conduct periodic air and noise monitoring.   
  
The doctor and occupational health nurse, working on contract for the site, examine health surveillance data to discern changes in overall employee health screening results to discern any trends that need to be addressed. Health professionals, appropriately trained and knowledgeable about site hazards, immediately treat employees for occupational health problems and follow each case until the individual can return full-time to all aspects of his or her assigned job. These professionals ensure that employee medical records are kept confidential so that diagnosis and treatment are not divulged, but management does have information about the employee under treatment as to the employee’s ability to perform job tasks, job limitations or accommodations needed, or the length of time the limitations must be implemented.

Management ensures that supervisors honor these restrictions. This health care is provided free of charge for all employees. The total plan is reviewed annually to assess its effectiveness.

Disciplinary Action

All employees, including all levels of management, will be held accountable for obeying site safety and health rules. The following four step disciplinary policy will be applied to everybody by the appropriate level of supervisor:

1. Oral warning
2. Written reprimand
3. Suspension
4. Dismissal

Visitors, including contractors who violate safety and health rules and procedures, will be escorted from the site. Should the disciplined person request a review of the disciplinary action, **[name]** will review the situation and make a recommendation to management, which reserves the right for final decision.

Personal Protective Equipment

**[name]** will provide the necessary PPE to ensure the well-being of the employee. These items include:

**[Modify the list, as appropriate.]**

* Safety glasses
* Gloves
* Hard hats
* Hearing protection
* Safety shoes
* Respiratory equipment

Supervisors must review work areas and operations and provide the necessary protection. Employees are expected to wear such PPE. Failure to do so may lead to discipline up to and including termination.

Safety Orientation and Training

All workers, managers, and supervisors will receive training and instruction on general and job-specific safety and health practices. Training and instruction will be provided:

* When the training program is initiated
* When new employees are hired
* When existing employees are reassigned to jobs for which they have not received prior safety training
* Whenever new substances, procedures, processes, equipment, or facilities are introduced and represent a new hazard
* On a regular basis to reinforce existing safety and health procedures

General job safety and health training will include:

* An explanation of the organization’s safety program and general safety rules
* Instructions to report unsafe conditions, work practices, and injuries
* Information about medical services and first-aid assistance and location of assistance and materials
* The use of PPE on designated jobs
* Information about chemical hazards to which employees could be exposed
* Elements of chemical labels and SDSs
* Procedures for responding to emergencies and fire prevention

In addition, we will provide specific instructions and training to all workers regarding the hazards that are unique to their job assignments, including wearing and caring for PPE, if required for the job.

List of training subjects

Following is a list of safety topics that will be covered, depending on each employee’s work assignments:

**[Modify this list as needed.]**

* Safe practices for operating equipment, including procedures for cleaning, repairing, servicing, and adjusting
* Lockout/tagout procedures for each type of machine
* Machine guarding for power-driven equipment
* Electrical hazards, including working around high-voltage lines
* Material handling
* Forklift truck operations
* Ergonomic hazards, including lifting and repetitive motion
* Proper use of power tools and hand tools
* Ladders, scaffolding, and elevated platforms
* Fall protection from elevated locations
* Hazard communication
* Good housekeeping
* Fire prevention
* Safe driving
* Permit-required confined space operations
* Welding/hot work permits
* Heat stress
* Bloodborne pathogens
* Workplace violence
* Crane operations
* Trenching and excavation work
* Noise and hearing protection
* Proper use and care of PPE

Safety Meetings

Management will conduct safety meetings for employees **[frequency]** and more often to discuss safety issues as they arise. A safety meeting includes all employees in a work area and at least one manager or supervisor to ensure that all appropriate issues are addressed. A manager or supervisor will cover one or more of the following issues:

* Review key safety topics.
* Review safety and health inspection reports to help correct safety hazards.
* Evaluate the accident investigations conducted since the last meeting to determine if the cause(s) of the unsafe situation was identified and corrected.
* Review any observed unsafe practices and ways to correct them.
* Reaffirm the need for safe work practices.
* Answer any questions employees may have about a safe practice, equipment operation, or other safety-related issues.

Formal safety meetings may be supplemented by “toolbox talks” of 10 or 15 minutes at the start of a work shift, or at other times as designated by a supervisor.

Safety meeting documentation

Each safety meeting will be documented with an attendee sign-in sheet and a meeting agenda that includes the supervisor’s name, date of meeting, and subject(s) covered.

Accident Investigation

If an employee sustains a work-related injury, the employee or a coworker will immediately notify the supervisor of the work-related injury or illness, and the supervisor will ensure the injured or ill employee receives prompt medical treatment.

If an incident results in an employee fatality, it must be reported to OSHA within 8 hours. Any incident that results in an amputation, inpatient hospitalization, or the loss of an eye must be reported to OSHA within 24 hours. Reports may be made by calling the local OSHA area office (<https://www.osha.gov/html/RAmap.html>), by calling the OSHA 24-hour hotline at 1-800-321-6742, or online at <https://www.osha.gov/pls/ser/serform.html>. The individual making the report must be prepared supply the business name, the names of employees affected, the location and time of the incident, a brief description of the incident, and a contact person and phone number.

The employee will complete the employee part of the **[name of the accident report form]**. If the date and time of the injury or illness cannot be determined, such as an injury caused by cumulative or repeated stress, the date of the last time that the employee worked is entered on the form.

See Attachment **[number]** for a copy of the Accident Investigation Report.

Any person who observes or causes damage to property or equipment will immediately report such damage to a supervisor.

Injury to visitors

Injuries sustained by visitors at a **[name]** work site must be reported to **[name, job title, or department]**. Injured visitors will be immediately provided medical treatment, if necessary. The causes of injuries to visitors will be investigated through the same processes as an employee accident investigation.

Near-miss incident

The investigation procedures for near-miss incidents will follow an abbreviated outline derived from the Accident Investigation Report procedures.

See Attachment **[number]** for a copy of the Near-Miss Investigation Report form.

Accident investigation procedures

The principal accident investigator and/or other accident investigator(s) will follow the procedures outlined below to conduct accident investigations:

1. Launch an accident investigation after a work-related injury or illness that requires medical treatment or property damage occurs at any **[name]** worksite.  
   **[Add one or both of the following sentence(s) if repetitive stress or near-miss accidents are investigated at your worksite:**  
   Repetitive stress injuries (not the result of a single accident) will be investigated.  
   Near-miss incidents will also be investigated.**]**
2. Assign investigators to carry out specific tasks. Such tasks include:
   * Inspect the accident site.
   * Interview witnesses and injured person(s).
   * Compile and review data.
   * Develop recommendations for corrective action(s).
   * Compile the written investigation report.
3. Present a preliminary briefing to the investigating team, including:
   * A description of the accident, with damage estimates
   * Normal operating procedures
   * Maps (local and general)
   * The location of the accident site
   * List of witnesses
   * Events that preceded the accident
4. Visit the accident site to:
   * Secure the site to protect evidence and prevent further injuries.
   * Inspect the area, including walking and working surfaces, equipment, entrances and exits, air quality systems, and all other conditions, processes, or items that could possibly have contributed to the accident or injury.
   * Record by tape recorder (if feasible) and in writing the details of the accident site, including lighting conditions, other environmental factors, and any unsafe conditions, tools, equipment, or operations.
   * Document the location of victims, witnesses, machinery, energy sources, and hazardous materials.
   * Prepare the necessary sketches and photographs, label each item carefully, and keep accurate records.
5. Interview each injured person and witness. Also, interview those who were present before the accident and those who arrived at the site shortly after the accident. Keep accurate records of each interview. Use a tape recorder, if desired and if approved.
6. **[Choose the best option for determining the cause of an accident or insert your own process; delete the option(s) not chosen:**
   * **Option 1: Abnormality determination**
   * **Option 2: Change analysis.]**

**[Option 1]**

After all information from the accident site and interviews has been collected, determine and record in writing:

* + What was not normal before the accident
  + Where the abnormality occurred
  + When the abnormality was first noted
  + How it occurred

**[Option 2]**

Conduct a change analysis of all the information from the accident site and interviews:

* + Define the problem (what happened?).
  + Establish the norm (what should have happened?).
  + Identify, locate, and describe the change (what, where, when, to what extent?).
  + Specify what was and what was not affected.
  + Identify the distinctive features of the change.
  + List the possible causes.
  + Select the most likely causes.

1. Analyze the data collected from the determination/analysis of accident causes. Repeat any of the prior steps, if necessary. Determine:
   * Why the accident occurred
   * A likely sequence of events and probable causes (direct, indirect, and basic)
   * Alternative sequences
2. Check each sequence against the data from the determination/analysis of accident causes.
3. Determine the most likely sequence of events and the most probable causes.
4. Develop recommendations for corrective action, if needed.
5. Conduct a postinvestigation briefing.
6. Prepare a summary report including the recommended actions to prevent a recurrence, and distribute the report according to applicable instructions. See Attachment **[number]** for a copy of the Accident Investigation Report form and instructions.

Recordkeeping

**[name]** will maintain all records related to this Plan. Unless otherwise noted, the records will be kept **[location]**. All records are available for employee and regulatory agency review on request.

**JHA Records.** All JHA records and forms will be kept by **[name]** for **[duration]**.

**Illness and injury records.** Our organization must record all employee injuries and illnesses on the following three forms:

**[Any employer with 11 or more employees in most industries must keep the following OSHA records: Forms 300, 301, and 300A. See 29 CFR 1904 of OSHA’s regulations for details about these requirements and whether your company is required to maintain these records.]**

**[In place of the OSHA 301 form, you may use another form, such as a state workers’ comp form, or an employer’s First Report of Injury form, available through many workers’ compensation insurance carriers. Add any information OSHA requires that is not called for on the form.]**

**[Each separate establishment (facility) must maintain its own OSHA Form 300 on-site. See OSHA Regulations (29 CFR 1904) for the definition of a separate establishment.]**

1. All supervisors are required to fill out the OSHA Form 301—Injury and Illness Incident Report for each injury or illness that is considered recordable under OSHA regulations at 29 CFR 1904. The supervisor must fill out the form within 7 calendar days after finding out about the injury or illness. A copy of this record will be sent to **[name]**. The company will keep these records for 5 years.
2. **[Name]** is responsible for entering the information on the OSHA FORM 300—Log of Work-Related Injuries and Illnesses within 7 calendar days of receiving notice of a recordable illness or injury. This form will be retained for 5 years even if there are no recordable injuries or illnesses.
3. At the end of each calendar year, **[name]** will review the OSHA 300 Log to verify that the entries are complete and accurate. This information will be summarized and entered on OSHA Form 300A—Summary of Work-Related Injuries and Illnesses. The Summary will be signed and dated by a company executive and will be posted in a conspicuous place available to all employees from February 1 to April 30.

**Accident investigation records.** **[Name]** will maintain comprehensive accident/ injury records and will maintain records of all accident investigation reports and data for **[duration]**.

**Training records.** **[Name]** will keep employee training records (e.g., curricula, written or electronic materials, sign-in sheets, individual employee records) for **[duration]**.

Supporting Materials

**[*Following is a list of supporting materials, such as forms or attachments, that you may need to supplement your EHS plan. Samples of the attachments are available at safety.blr.com.*]**

Attachment **[number]**—Job Hazard Analysis Worksheet (simple)

Attachment **[number]**—Job Hazard Analysis Worksheet (detailed)

Attachment **[number]**—Employee Report of Hazard

Attachment **[number]**—Personal Protective Equipment Hazard Assessment Certificate

Attachment **[number]**—Accident Investigation Report

Attachment **[number]**—Near-Miss Investigation Report