



# S A F E T Y N E W S B U L L E T I N

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## Reminder...

**It is time to post the OSHA Form 300A Summary of Work-Related Injuries for 2017 (Posting time February 1, 2018 – April 30, 2018)**

- **Review Log 300 for accuracy and correct any deficiencies;**
- **Summarize Work-Related Injuries for 2017 on the Form 300A;**
- **Certify the Form 300A; and**
- **Post the Form 300A in an area for all employee access**

## When is the Last Time a Safety Violation was Written at Your Company?

Written Safety Violations are an effective way to ensure that your company's safety program is taken seriously by your employees. It may also prevent an injury or ultimately save an employee's life.

The enforcement of the safety policy is also a key element to OSHA'S Independent Act Defense. In order to prove an employee Independent Act defense when appealing an OSHA citation the following conditions must apply:

1. The employee was experienced in the job being performed.
2. The employer has a well-devised safety program that includes training employees in matters of safety respective to their particular job assignment.
3. *The employer effectively enforces the safety program.*
4. *The employer has a policy, which it enforces, of sanctions against employees who violate the safety program.*
5. The employee caused a safety infraction that he or she knew was contrary to the employer's safety requirements.

## A few key items to remember:

- **Give acknowledgement, praise and rewards at least twice as much as you enforce.** Employees respond to positive reinforcement and this creates good will and good safety culture in your organization.

- **Effectively enforce the safety program.** It's not enough to simply have your IIPP written and sitting on the shelf. Your employees must be aware of your IIPP. The employer must also take steps to correct employees when they see those policies and procedures violated - and not wait until the violation reaches the level causing a change of attitude from other employees about the effectiveness of the safety program.
- **The Supervisor enforces the safety program.** Supervisors, as a rule, don't tend to enjoy disciplining employees. But you need to have a way of assuring employee compliance with safe work practices, not just for the safety of that employee, but also for the safety of others. Supervisors need to be trained on when and how to properly use your disciplinary system. Their performance on this should be part of their annual evaluation.
- **Remember to have consequences to your enforcement program.** There must be progressive discipline otherwise your employees will not take the program seriously and OSHA will not accept it as an Independent Act Defense.

Ask your SCC Representative to train your Supervisors and discuss your IIPP enforcement policy.

Sincerely,

Kirk Herold  
Vice President  
(562) 822-7233  
kirkh@safetycompliance.com

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Thomas Herold, President