Guide to Writing an OHS Policy Statement



Why should I have an occupational health and safety (OHS) policy statement?

Regulators requires employers to have a health and safety program in their workplace. A written occupational health and safety policy helps promote an effective OHS program. Such a policy should reflect the special needs of your workplace and should be regularly reviewed and updated. This document will assist you in writing and applying a policy for your workplace. This policy communicates a commitment to health and safety. It should be signed by a senior manager or president to further demonstrate the commitment to health and safety.

What is a policy?

CSA Standard Z1000-14 Occupational Health and Safety Management defines an OHS policy as “overall intentions and direction of an organization related to its OHS performance.”

The Gage dictionary defines “policy” as “a plan of action; a course or method of action that has been deliberately chosen and that guides or influences future decisions.” By stating principles and rules, an occupational health and safety policy guides actions. A policy statement indicates the degree of an employer’s commitment to health and safety. The statement of the employers’ obligation should be more than an outline of legal duties.

What makes a policy statement effective?

There are many differences in form and content of corporate policies. Their style, however, is not as important as the clarity with which they identify functional responsibilities over authority.

To be effective, a policy must:

- involve senior management and representatives in the preparation of the policy,
- be seen as consistent with the workplace’s objectives of operating in an efficient and predictable manner,
- be relevant and appropriate to the nature, scale and OHS hazards and risk

associated with that workplaces' needs (not adopted from another workplace), and
- be accepted as equal in importance to the workplace's other policy objectives.

What types of issues should the OHS policy statement cover?

The policy statement should provide a clear indication of the company's objectives and plans for occupational health and safety. The following issues should be covered in the statement:

- senior management's commitment to the establishment of a healthy and safe workplace and to the integration of health and safety into all workplace activities,
- the commitment to comply with applicable OHS legal requirements and other requirements – or better, the intention to treat applicable health and safety legislation as a minimum standard rather than maximum,
- responsibility of appropriate personnel in maintaining a healthy and safe workplace and to protect the well-being of all persons in the workplace,
- accountability of all levels of management for carrying out health and safety responsibilities,
- importance of consultation and co-operation between management and employees for effective implementation of policy and any related programs,
- commitment to continual improvement by conducting regular reviews of the policy,
- commitment to monitor the policy's effectiveness by having a method for setting and reviewing OHS objectives and targets,
- that the policy will be documented, posted, and communicated internally as well as externally, as appropriate, and
- commitment to provide adequate funds and details of how money will be available.

Who should write the policy?

The best policies are specific to a workplace and reflect the nature, scale and OHS hazards and risk for that workplace. An employer may delegate the preparation of a policy to a staff member. The policy should be written in consultation with the health and safety committee or representative, or with workers or their representatives. However the written occupational health and safety policy statement is a pledge to employees and therefore the employer is responsible for content. The safety policy should be dated and signed by the senior executive of workplace.

What should be considered when writing the policy?

These are some of the major items to consider.

- The policy should state the arrangements in place to support and implement it. Such items as safety meetings, safe working procedures, occupational hygiene, and education and training should be outlined.
- The policy should address the types of hazards associated with the workplace. Depending on the types of tasks performed and the hazards present, it may be necessary for the employer to become fairly specific and detailed in outlining hazards at the workplace.

- The policy should discuss active and on-going participation of employees in helping to achieve the objectives.
- Policy statements need to be amended from time to time. They must keep pace with the changes occurring at the workplace. CSA Z1000-14 recommends an annual review, and as required.

The following are questions that need to be considered for preparation of a policy:

- What is the goal of the safety program – to have fewer injuries and illnesses than similar operations? to reduce by 10%?
- When confronted with conflicting priorities or allocation of limited resources, does safety get more importance? Equal importance? How is this decided?
- Is safety the responsibility of line management or staff management – who is accountable?
- What benefits does management expect to derive from an effective program?
- Who will be assigned responsibility for coordinating activities?

Who has responsibilities under the policy?

No matter how well written, a policy is no more than empty words if a plan does not exist to put the policy into effect throughout the organization. The policy can only be put into effect where:

- responsibilities are clearly defined and assigned,
- methods of accountability are established,
- proper procedures and program activities are implemented,
- adequate provision of financial and other resources are provided, and
- responsibilities for carrying out the policy objectives are clearly communicated and understood within the workplace.

While the assignment of responsibilities must be a complete list customized to your type of work and organizational structure, avoid being too specific that it makes people become to legalistic in interpreting the policy. For example, do not list the specific type of personal protective equipment that must be worn by an employee – simply state that all employees must use the personal protective equipment specified by the employer and as required by the nature of the work. This way you have flexibility to make changes as circumstances warrant.

Responsibility should be extended throughout the organizational structure to ensure policy objectives will become integrated into all activities. For example, a policy could specify:

- individual responsibilities (Outlined in Appendix A),
- legal responsibilities,
- accountability systems,
- promotion of health, safety and well-being awareness,
- education and training needs,
- reporting and correcting health and safety deficiencies, and
- injury and illness control information.

How can the policy be incorporated into regular workplace duties and

actions?

Methods of establishing accountability should be designed to monitor the quality and adequacy of workplace procedures, including:

- inclusion of accountability in the statement of policy,
- inclusion of health and safety responsibilities and performance objectives in job descriptions,
- procedures for ensuring that health and health performance is considered as part of performance appraisals and salary reviews,
- regular health and safety program reviews, and
- regular reporting requirements built into program elements.

Part of a successful policy is making sure that all employees are aware of it. If the workplace's plan for implementing the policy is a good one, employees will be reminded in their day-to-day activities, in safety meetings, and during orientation and training.

A responsibility to adhere to the health and safety policy may be part of the employees' job descriptions. Each employee, on beginning employment, may be given a copy of the policy and informed that it is a condition of employment to follow the policy.

The workplace can reinforce its commitment to the policy by having regular safety talks, posting signs at the workplace, by writing articles about the policy in company newsletters, posting on the internal website, sending e-mails, by referring to it in job manuals and so forth.

Each workplace will undoubtedly have its own way of keeping its employees informed. The important thing is to have a plan and to follow through on it.

What are examples of how to communicate the policy to others?

An effective policy for health and safety management must be:

- clearly defined and communicated,
- backed up by sound arrangements and put into practice,
- reflected in day-to-day attitudes and actions of people, and
- monitored.

Ways in which policy and responsibilities can be communicated include:

- orientation (induction) training,
- policy and procedure manuals,
- health and safety committees,
- job descriptions,
- website, notice board notices and reminders,
- safety talks, meetings, and refresher training,
- senior management attendance at safety meetings, and
- demonstration of senior management commitment through effective response and review to committee recommendation inspection reports, incident investigations, and health and safety program evaluations.

What are some suggestions for implementation of the policy?

- To implement a policy, health and safety activities must be identified and assigned. While each workplace will do this in its own way, there are some general issues which should be addressed:
- The policy should state that the workplace has clear rules for healthy and safe work behaviour. It should clarify who is responsible for developing, observing, and enforcing the rules.
- There should be clear guidelines for maintaining and operating equipment and machinery. Again, individual responsibilities must be clarified.
- The policy should state what type of education or training program will be provided by the company to ensure that employees can meet their responsibilities. This learning could include first day orientation, on-the-job training, and refresher courses.
- The means for providing employees with information about basic or specific workplace hazards, and detailed written procedures for hazardous jobs should be outlined.
- Regular worksite health and safety meetings at all levels of the organization are an essential part of a good safety program. The policy could identify what issues will be discussed at these meetings, what can be communicated verbally, and what should be in writing.

What is an example of a policy checklist to review an existing or new policy?

Here is a sample of a series of questions that could be put in “Yes / No” checklist:

- Does the statement express a commitment to health, safety, and well-being? Are obligations towards employees made clear?
- Does it say which senior officer is responsible for seeing that it is implemented and for keeping it under review, and how this will be done?
- Is it signed by senior executive?
- Have the views of managers and supervisors, safety professionals, and health and safety committees or representatives been taken into account?
- Were the duties set out in the statement discussed with the people concerned? Do they understand how their performance is to be assessed and what resources they have to carry out their tasks safely?
- Does the statement make clear that cooperation on the part of all employees is vital to the success of the health and safety policy?
- Does it say how employees are to be involved in health and safety matters, for example, by being consulted, by taking part in inspections, or by participating on a health and safety committee?
- Does it show clearly how the duties for health and safety are allocated, and are the responsibilities at different levels described?
- Does it say who is responsible for the following matters?
    - Investigation reports and incident records.
    - Fire precautions and evacuation procedures.
    - First aid.
    - Safety inspections.
    - Education and training program.
    - Ensuring legal requirements are met.
- Is management solely responsible for providing a healthy and safe working

environment?
- Is employer’s concern for health and safety as great as concern for economic financial and marketing matters?
- Does it include the names of individual managers who are responsible for making the safety policy work in specific areas or departments?
- Does it state the employer’s duty to give education and training in health and safety to all employees?
- Does it outline the development and maintenance of health and safety roles and procedures?
- Does it include planned programs for health and safety at work?
- Does it ensure that health and safety matters will be taken into account when planning new methods processes or premises?
- Does it include arrangements for disclosing information, including multilingual information, on health and safety and well-being matters?
- Does it explain how money is to be made available to support health and safety?
- Do all employees have copies of their employer’s health and safety policy?
- Are workplace representatives consulted about periodic revisions and updating of the employer’s health and safety policy?
- Has the policy been reviewed with the health and safety committee?
- Does it state who will review the policy and how often it will be reviewed?
- Are there effective arrangements for drawing the policy to the attention of all employees?
- Is the delegation of duties logical and successive throughout the organization?
- Is it clear that the ultimate responsibility for safety rests with senior management?
- Are the responsibilities of senior managers written into the policy or into job descriptions?
- Are there procedures and controls in place that ensure accountability?
- Is health and safety performance an essential ingredient of performance appraisals?
- Do line managers understand and accept the nature of their health and safety responsibilities?
- Are there arrangements for liaison with contractors?
- Are all individuals aware of their legal responsibilities?

Appendix A

Responsibilities of Individuals

Individuals have a responsibility to carry out their assigned duties. For a health and safety program to achieve its desired results, everyone in a workplace must know their responsibilities.

The following are samples of assignments of responsibilities designed for different-sized organizations. Select and customize, or create your own version.

Employees

- Carry out work in a manner so as not to create a health and safety hazard to yourself or others.
- Participate in education and training.
- Assist in the reduction and controlling of incident and illness producing

conditions.
- Report any incidents, near misses, injuries, or illnesses.
- Use the correct tools and equipment for the job.
- Keep tools and personal protective equipment in good condition or replace when necessary.
- Use the required safety equipment and personal protective equipment.
- Report defects in workplace equipment.
- Develop a personal concern for health and safety – for yourself and for others, particularly newcomers and young people.
- Suggest ways to eliminate hazards or control risk.
- Read, understand, and comply with workplace health and safety policy, safe work practices and procedures.
- Co-operate with health and safety committee members and representatives.
- Participate in medical surveillance (e.g., hearing conservation programs, medical monitoring, etc.).

Safety Co-ordinators/Officers

- Advise management and employees on:
- preventing injury and illness to personnel and damage to plant and equipment
- legal requirements affecting safety, health and well-being
- provision and use of protective clothing and equipment
- suitability, from a safety viewpoint, of new equipment, and validity of all appropriate test certificates
- potential hazards on new contracts before work starts and precautions required
- changes in legislation, standards, etc.
- Record and analyze information on injuries, illness, damage, and production loss.
- Assess incident trends and review overall safety performances.
- Maintain contact with professional bodies (e.g., medical systems, engineers, occupational hygienists, etc.).
- Take part in workplace discussions on injury, health and welfare, damage control.
- Keep up-to-date with recommended codes of practice and new health and safety literature.
- Administer the health and safety program.
- Assist in incident investigations, analysis and preparation of incident reports and summaries.
- Prepare inspection reports.
- Ensure that corrective action has been taken whenever deficiencies are identified.
- Assist with health and safety seminars, education, or training.

Senior Executive/Managers

- Provide a statement of policy relating to the health and safety program.
- Maintain overall responsibility for the health and safety program.
- Ensure that all established health and safety policies are administered and enforced in all areas.
- Ensure that all personnel are aware of and effectively practice the policies and procedures set out in the health and safety program.
- Provide information, instructions, and assistance to all supervisory staff

in order to protect the health and safety of all employees.
- Understand and enforce the incident prevention policy as well as the occupational health and safety legislation.
- Provide all supervisory staff with proper, well-maintained tools and equipment, plus any personal protective devices which may be required.
- Provide ongoing health and safety education or training programs and approved first aid training courses as required.
- Monitor departments and projects and hold them accountable for their individual health and safety performance.

Line Management/Supervisors

- Co-operate with health and safety committee members
- Provide instructions to employees about safe work procedures. As part of the routine duties, the supervisor shall require employees to use personal protective equipment as appropriate.
- Provide an example for others by always directing and performing work in a safe manner.
- Conduct regular inspections for unsafe practices and conditions and ensure prompt corrective action.
- Work in cooperation with others in determining safe practices, enforcing their observance, developing procedures for dealing with violations and general safety and incident prevention.
- Enforce all established safety regulations and work methods. Take corrective action as necessary to ensure compliance with the rules.
- Know and apply the workplace safety policy and relevant occupational health and safety legislation.
- Arrange for medical treatment as required, including transportation to a doctor or hospital as necessary.
- Report all incidents immediately, investigate all incidents fully, and advise management on how to prevent similar incidents in the future.
- Carry out regular inspections of the work place to ensure a safe and healthy environment.
- Hold regular safety meetings to review safety conditions and general safety policies.
- Accompany the government inspector during inspections.
- Be aware of the hazards that exist for the short term, temporary and newly hired employee. Ensure that new employees receive detailed safety instructions before they are allowed to start work.

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