

# How are your Health & Safety Policies?

Originally Published *Board Room Magazine*, February 2003

© ALAN E. ACHATZ, CCM, CHE

*Compliance & Documentation Services*

[www.ClubSafetySolutions.com](http://www.ClubSafetySolutions.com)

The Occupational Health & Safety Administration (OSHA) announced on February 25, 2002 that they are mailing 13,000 letters to work sites with the highest incidence of injuries and illnesses.

Establishments with the nation's highest lost workday injury and illness rates were identified by OSHA through employer-reported data from a 2001 survey of 80,000 work sites (the survey consisted of data from calendar year 2000) and employers who had 8 or more incidents per 100 employees were targeted.

The letter signed by OSHA Administrator John L. Henshaw informed these employers that they should consider getting Health & Safety assistance through either their insurance company; a consultant; or via OSHA's Voluntary Protection Program (VPP) or a similar State program.

Before you choose any course of action consider the following:

## **Your Insurance Company:**

All businesses are seeing radical changes in the insurance industry. It's not uncommon for clubs to see a 50% increase in their premium from last year. Obviously, that's quite an impact on the bottom line.

Other insurance considerations:

- Some of the familiar insurance carriers are no longer catering to the club industry.
- Some companies are eliminating their Health & Safety professionals to save money.
- There is a slight chance you may get a discount on your premium if you have an active health & safety committee.
- Your insurance company has a great safety video library for you to use.

## **A Consultant**

- Can assist with required policy development and employee education.
- Can be expensive.
- May not know all the facets of the private club environment.

- OSHA has determined that a self-audit (consultant's audit) can not be used against you.

### **OSHA's Voluntary Protection Program (VPP) or similar State Program**

- No cost to you.
- Can not be fined for violations initially discovered.
- Have to adopt recommendations and comply with report in a timely manner or you may be subject to OSHA citations, fines & penalties.

A potential major draw back of this program was shared with a group of club managers in Boston, MA (February 1999) when the speaker – an OSHA representative who was in charge of the VPP for this area was asked if he ever had to report a VPP work site to OSHA for non-compliance. His response was approximately 1 in 50 businesses were submitted to OSHA for non-compliance and subject to fines. After that question was answered, not too many more were posed!

### **What are you doing for Health & Safety at your Operation?**

Did you receive one of the 13,000 letters sent by OSHA? Have you looked at your OSHA 200 log to see what injuries/illnesses have occurred at your establishment? Have you looked at your OSHA 200 log from the past few years to determine if there is a pattern of recurring injuries/ illnesses? And if there is a pattern, what are you doing to change it?

Sometimes the solution is easy to determine once you are aware of the problem. A golf course superintendent and this author were reviewing his OSHA 200 logs for the past few years when the multiple incidents of poison ivy exposure became readily evident. It turned out that the non-English speaking crew just needed to be shown a picture of the 'weed' they were supposed to leave alone.

### **What OSHA Policies Might be Needed at your Club?**

All operations are different and may require some policies that another might not need.

Every club should have the following:

Blood Borne Pathogen Policy  
Hazard Communication Standard with annual MSDS training  
Lockout / Tagout Policy  
Emergency Action Plan  
Personal Protective Equipment Policy  
Hearing Conservation Plan

Other policies may include:

Respiratory Standard > for pesticide applicators or paint spraying operations  
Permit Required Confined Space Policy > for specific dangerous areas  
Forklift Policy  
Diving Operation Policy  
Fire Brigade Guidelines & Procedures  
Welding, Cutting & Brazing Policy

Other considerations may involve:

Walking Working Surfaces – guarding manholes, floor/wall openings, use of ladders  
Hazardous Materials - propane, acetylene, anhydrous ammonia...  
Materials Handling & Storage – servicing multi-piece & single piece rim wheels  
Machinery & Machine Guarding  
Hand and Portable Powered Tools and other Hand-held Equipment  
Electrical Systems and Practices

#### Geographic Considerations

Of course, where you live might influence employee safety concerns. While the specific concerns may or may not be OSHA related, they do impact your employees.

At the recent Club Managers Conference in San Antonio, a few managers submitted their hurricane emergency action plans and they were quite impressive.

Emergency plans from other areas may include procedures for earthquakes, tornadoes or even winter storms. Prevention of heat stroke may be another seasonal concern.

#### What are you doing now?

A good idea would be talking with your employees about incidents that may befall your club. Ask for their input and start addressing the concerns for your operation. Who knows, your operation might even become both a fun and safe place to work!