

Club Safety Compliance and Best Practices

By Alan Achatz, CCM, CHE

HOW DO YOU ADDRESS SAFETY? Are you proactive or reactive? Or do you not do anything because you don't know what you don't know?

All clubs want to protect their employees from undue harm. Carefully assessing and addressing on-the-job hazards and reviewing federal and state safety compliance regulations and proper safety procedures can help clubs reduce workplace injuries.

The Occupational Safety and Health Administration (OSHA) covers almost all employers and employees in the United States. OSHA's mission is to assure safe and healthful working conditions for all workers. Covered employers are responsible for complying with OSHA's "general duty" clause, which states that each employer shall furnish to each employee, "employment and a place of employment that are free from recognized hazards that are causing or likely to cause death or serious physical harm to his employees." For additional information, see sidebar "OSHA Safety and Health Standards," page 29.

How to Start a Safety Program

Starting a program may seem like a Herculean task, but it can be achieved by taking the appropriate steps.

The first requirement to developing an effective safety program is to ensure buy-in by the board and employees.

This begins by defining the goals and the actions required to achieve them. However, before you develop a safety policy, you must understand the major issues surrounding employee health and safety.

The best way to understand what actions your club should take is to review what has happened in the past. This means reviewing data from previous incidents listed on the workers' compensation submissions: the employee visits to your local hospital/emergency care center and/or the information on the OSHA 300 and 300A logs (See sidebar "OSHA Recordkeeping," page 28).

Awareness of injury/illness information will provide you with knowledge necessary to prevent the same incident from occurring again. It also serves as an important reminder to thoroughly document each incident in order to access this data and make sound decisions.

Start a Safety Spreadsheet

Clubs should have a document to collect their safety information. For this, again utilize your workers' compensation or OSHA 300 logs. It is recommended to go through the past five years to parallel OSHA's recordkeeping requirements for retaining your 300 and 300A logs. (If you have not recorded your OSHA 300 and 300A logs, start now and list all the data from the past five years.)

In the spreadsheet, create essential categories of data such as: year, date and location of injury, employee department, and type of injury. The types of injury can include: slips, trips, falls, back injury, lifting, burns, knife cuts, abrasions and other cuts, falling objects, head injuries and eye injuries. Some other items might include chemical exposures, insect/bee stings, poison ivy/oak/sumac and golf cart injuries.

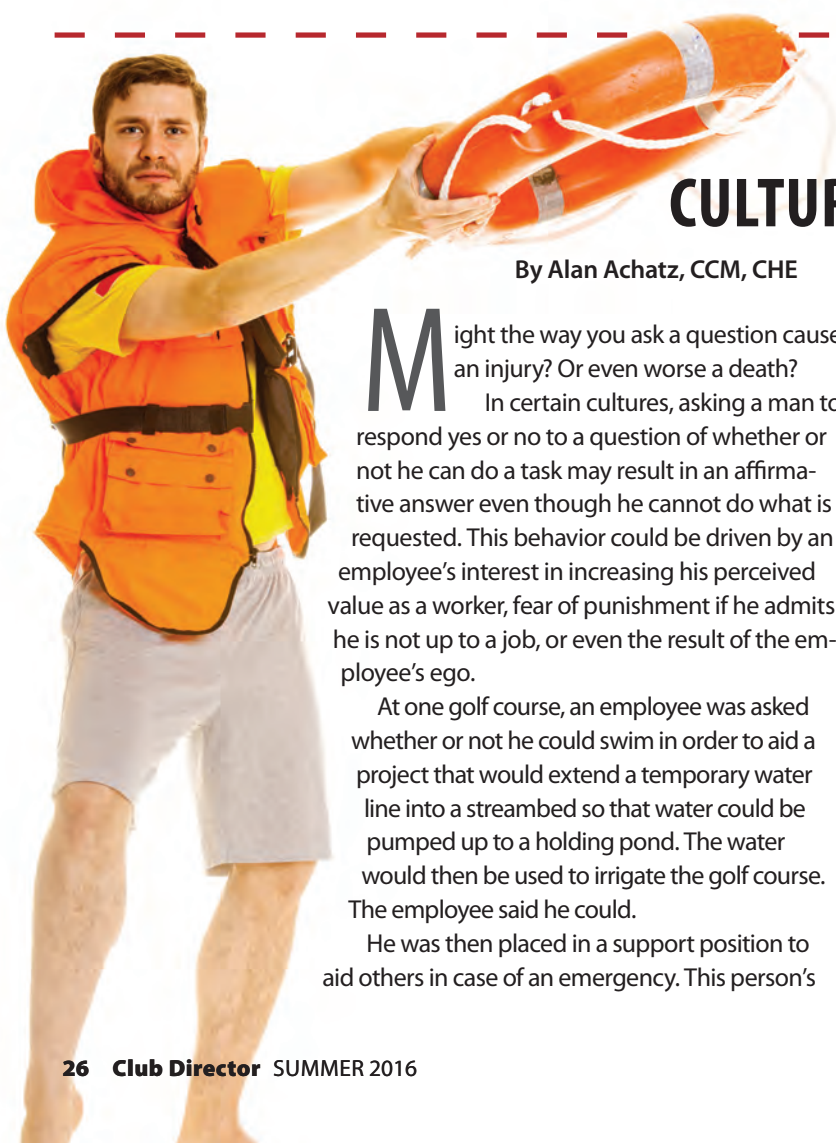
The day of the week and time of the day categories can assist with trend recognition. Are the majority of events happening at the beginning of the workday or at the end of the day? Was it an exceptionally hot or cold day? The day after payday? Days near a holiday?

As you develop your injury/illness spreadsheet, be sure to exclude the employees' names for confidentiality reasons. However, it may be important to know if there are any patterns emerging with specific employees. Perhaps some are "ill" the first week of July every year. There may be patterns emerging with employees for whom English is a second language, indicating that additional training may be required for the particular hazard those employees are encountering.

Other questions that might have to be asked include: How long have the employees been on the job? Are they new employees? Are they adequately trained?

Looking for Trends and Learning from Past Events

When reviewing your past injuries/illnesses records, determine if there is a common area where the incidents are happening or a particular process that can be changed to eliminate additional events from occurring. Be proactive, not reactive, when addressing inci-



CULTURAL DIFFERENCES

By Alan Achatz, CCM, CHE

Might the way you ask a question cause an injury? Or even worse a death?

In certain cultures, asking a man to respond yes or no to a question of whether or not he can do a task may result in an affirmative answer even though he cannot do what is requested. This behavior could be driven by an employee's interest in increasing his perceived value as a worker, fear of punishment if he admits he is not up to a job, or even the result of the employee's ego.

At one golf course, an employee was asked whether or not he could swim in order to aid a project that would extend a temporary water line into a streambed so that water could be pumped up to a holding pond. The water would then be used to irrigate the golf course. The employee said he could.

He was then placed in a support position to aid others in case of an emergency. This person's

responsibility was to be in a canoe, near where others were working in the water. This person had a long bamboo pole to propel the canoe or hold the canoe in a stationary position. Unfortunately the employee lost hold of the pole and fell in the water. He could not swim.

The others in proximity could not get to this person in time and unfortunately, since he was not wearing a life jacket, the employee drowned.

Knowing this information after the fact allows us to consider how the question should have been asked, "When was the last time you went swimming?" In addition, the employee should have been wearing a life jacket.

It is all too often that we think by asking a question that we have asked it properly—and that a nod of the head acknowledges that the employee has understood or is able to do a job.

Clubs must be fully confident that the question asked elicits the truth.

dents. Don't automatically assume that because there is a pattern of head, arm, or hand injuries that employees must wear gloves, hard hats, etc.

Visit the site where the incident occurred and consider the factors leading to the injury. Ask the questions: who, what, where, why, when and how? Were there any special circumstances at the time? Did your kitchen have a significant number of knife cuts? Are the bartenders cutting their fingers because they don't have a proper knife/cutting board? Would a knife safety training program help?

The club should also discuss injuries. According to *Industrial Accident Prevention: A Scientific Approach*, for every disabling injury there were 29 first aid incidences, preceded by 300 near misses. That means there were 329 opportunities to save one person from the pain and suffering experienced from a disabling injury. It must be noted that not all safety professionals ascribe to this safety interpretation.

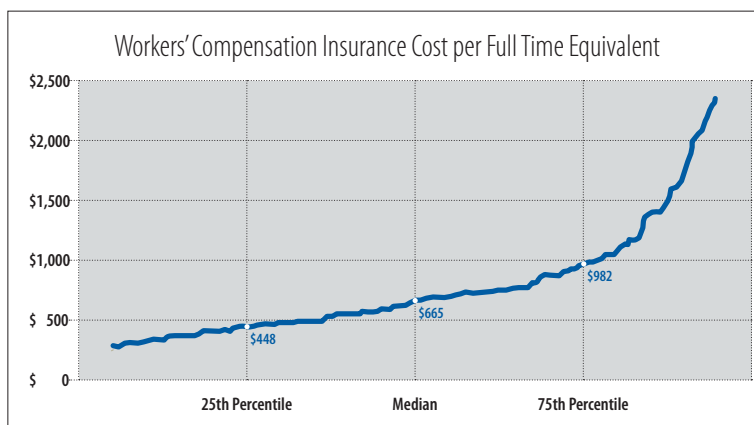
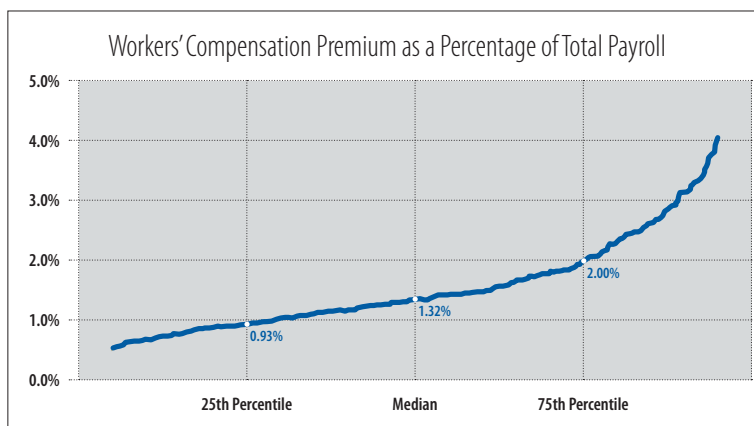
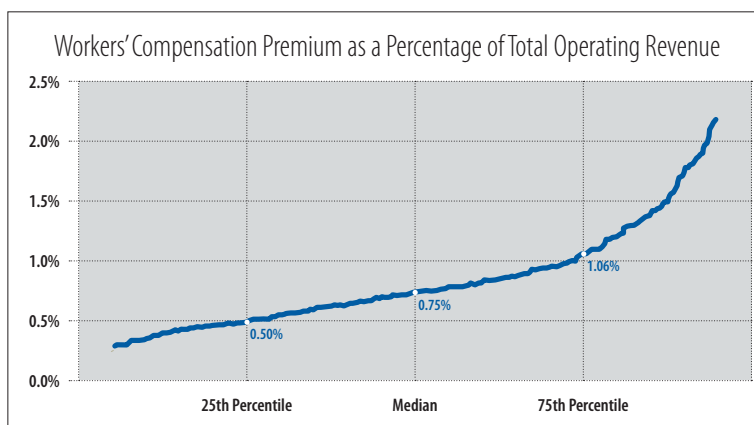
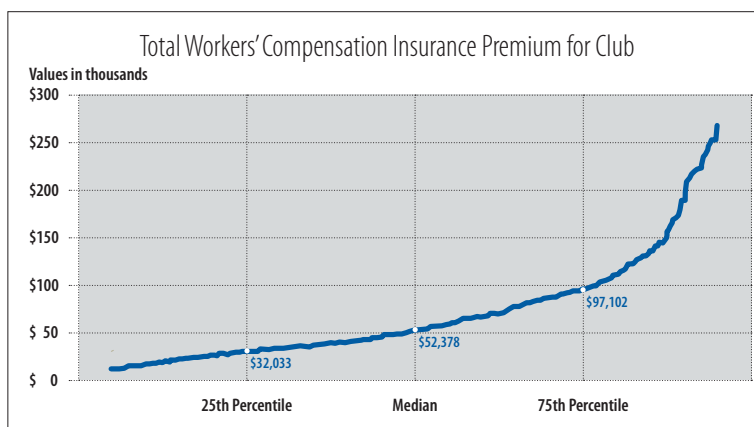
The Safety Budget

How much money should clubs use to fund a safety program? One method is to look at your workers' compensation premium and use a percentage (10%, 15% or maybe 20%) to get the program underway. See the graphs from Club Benchmarking for club workers' compensation costs at right. According to OSHA, an effective safety and health program saves time and money—about \$4 for every \$1 spent.

Clubs, like many other businesses, have experienced difficult times. Budgets have been cut, preventative maintenance programs deferred and capital expenditures delayed. Some of the ways to make sure your club has an effective safety program may include contacting your insurance provider to enlist their assistance with training, as they often have a library of safety videos. A club may conduct a worksite self-inspection, and OSHA offers on-site consultations by state agencies as well.

Successful education programs may eliminate or reduce potential future incidents. In addition, lowered insurance premiums from fewer employee incidences can show that the ongoing training is effective and provides cost savings.

Items to include in the club safety budget are: personal protective equipment, training videos and classes/sessions, wages for employees being trained, consultant fees and cash and/or prizes for rewards and incentives.



CHARTS SOURCE: CLUB BENCHMARKING

The Club Safety Committee

Forming a Safety Committee will help create continuity and accountability for your safety program. The Safety Committee should be comprised of both club management and employees—especially those who are safety champions. It is important to get the most positive employees involved and develop a team around them.

Who is knowledgeable when it comes to safety? Do you have any employees who are emergency medical technicians, retired police officers, spouses who work in the medical profession or who used to be employed as safety professionals? Are there any members of the club whose services could be used?

Each incident offers an opportunity to correct the situation whether it is an unsafe act by an employee, a training issue, design problem, faulty tool or perhaps a lack of awareness.

Make sure the committee size is manageable—choose from six to 10 members. Consider involving all the departments by inviting a representative from each to serve on a rotating basis, or perhaps use an ad hoc committee to solve a particular concern.

The Safety Committee should have a written mission statement and clearly defined duties and responsibilities. One goal should be to

increase awareness of employees in safety matters as well as to make health and safety activities an integral part of the club's operating procedures, culture and program. The committee should conduct regular safety audits of the property, identifying hazards and making recommendations for corrective measures or training to prevent repeat injuries.

Accident investigation is always a concern. It is possible that individuals may not speak up as to avoid negative consequences or punishment. Are the employees afraid of being blamed? Is the root cause being diligently sought? Dedicate the time to perform a proper investigation and be sure the staff is properly trained on how to conduct an accident investigation.

The first step in investigating an accident is to look at the circumstances:

- Who was involved?
- What tasks led up to the event?
- What tools were being used?
- How were the tools being used?
- Was the person involved properly trained on how to use the tools?
- When did the incident occur? (Beginning of the day? Beginning of the workweek?)
- Where did the incident occur?
- Is there an environmental factor that precipitated the event?

Each incident offers an opportunity to correct the situation whether it is an unsafe act by an employee, a training issue, design problem, faulty tool or perhaps a lack of awareness. It is important for the supervisors to have a level of trust with the employees. Employees must be comfortable approaching the supervisor on any issue. In addition, employees need to believe that if they approach

OSHA RECORDKEEPING

Employers with more than 10 employees are required to follow OSHA regulations and maintain records related to workplace injuries and illnesses, including:

- **OSHA Form 300 injury/illness log.** This form is completed for each injury and illness to record detailed information. Employers may use equivalent records that record the same details, such as insurance or workers' compensation forms. Each year, the employer must post Form 300A, summarizing the previous year's work-related injuries and illnesses.
- **OSHA Form 301 individual incident report.** This alternative form that employers may use records the same details as provided on an insurance or workers' compensation form.

Contacting OSHA

Each employer must advise the nearest OSHA office of any accident that results in one or more fatalities or in the inpatient hospitalization

of one or more employees. Fatality notification is required within eight hours of the accident. Inpatient hospitalization, loss of an eye or an amputation must be reported to OSHA within 24 hours.

You can report to OSHA by calling OSHA's free and confidential number at 800-321-OSHA (6742), or call your closest Area Office during normal business hours. Accidents may also be reported online at osha.gov/pls/ser/serform.html.

Only fatalities occurring within 30 days of the work-related incident must be reported to OSHA. Further, for an in-patient hospitalization, amputation or loss of an eye, these incidents must be reported to OSHA only if they occur within 24 hours of the work-related incident.

SOURCE: HR MANAGEMENT: BEST PRACTICES FOR PRIVATE CLUBS, NCA, 2013.

the supervisor or manager, their concerns will be taken seriously and addressed.

Knowing what happened leads to finding out how it happened and, hopefully, preventing the event from happening again.

Safety Committee Activities

Some states have regulatory requirements for establishing safety teams and mandate the frequency of meetings. Monthly committee meetings are recommended and should include regular updates on safety issues and the progress toward completing action plans. A Safety Committee member also should be included in all accident investigations.

Safety Committees can get stale or possibly even lose their focus. Management should regularly review the committee's meeting minutes, offer input and provide any necessary guidance. Changing and/or rotating team members might also provide new perspectives.

Communications

The Safety Committee can determine various ways to share what they are doing with all departments and staff members. Some ideas might be a newsletter sharing the minutes, a topic of the month, seasonal concerns, safety ideas for the home or perhaps even a case study. It is important that the committee does not reveal the identity of any injured employee, lest they lose their credibility or initiate a lawsuit.

The committee should also communicate safety concerns with employees (near misses/close calls) and recognize service, participation and engagement in the club safety program.

Finally, club management should share safety concerns with all new employees.

Starting a safety program isn't an easy task. Recognize it takes time, resources and commitment. Additional information about workplace safety can be found in NCA's publication, *HR Management: Best Practices for Private Clubs*, available online at nationalclub.org. **CD**

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OSHA SAFETY AND HEALTH STANDARDS

Separate and apart from the general duty clause, OSHA has developed safety and health standards with which employers must comply. The standards may be industry specific or applicable to all employers. For example, all employers must: 1) offer employees or their designated representatives access to relevant medical records, including records related to the employee's exposure to toxic substances, and 2) provide employees with personal equipment designed to protect them against certain hazards and must ensure that employees are effectively trained in the use of the equipment.

Other important standards cover issues such as blood borne pathogens, emergency medical care and first aid, ergonomics, fire safety and protection, hazard communication, lockout/tagout, and personal protective equipment.

SOURCE: HR MANAGEMENT: BEST PRACTICES FOR PRIVATE CLUBS, NCA, 2013.



SAFETY FIRST

Here are some additional actions to consider when developing a health and safety program:

- Post the club's safety policy, including information on the importance of worker safety and health, next to the OSHA workplace poster where all employees can see it.
- Communicate with employees via periodic meetings to discuss the safety policy and objectives for safety and health for the year.
- Educate the board of directors about the importance of OSHA.
- Obtain board support for safety programs from the board of directors.
- Guarantee management commitment by making sure all managers and supervisors follow the same safety requirements that employees must follow.
- Use your employees' special knowledge and help them buy into the club's safety programs.
- Make clear assignments of responsibility for every part of the safety program and ensure that everyone understands his or her role.
- Make it a special part of everyone's job to operate safely.
- Recognize and reward employees who contribute to the club's safety efforts. Review the program at least annually to assess what has been accomplished and decide if new objectives or program revisions are warranted.

SOURCE: HR MANAGEMENT: BEST PRACTICES FOR PRIVATE CLUBS, NCA, 2013.

SAFETY [seyf-tee], noun

1. The state of being safe; freedom from the occurrence or risk of injury, danger or loss.
2. The quality of averting or not causing injury, danger or loss.
3. A contrivance or device to prevent injury or avert danger.
4. The action of keeping safe.

SOURCE: DICTIONARY.COM

