TRINIDAD & TOBAGO
O·S·H·A
THE OCCUPATIONAL SAFETY AND HEALTH AUTHORITY AND AGENCY

Guidance in preparing a Safety & Health Policy



OSHA HOTLINE: 623-OSHA (6742)

www.osha.gov.tt

Introduction

Occupational Safety and Health Act Chapter 88:08 (the OSH Act) requires inter alia, every employer of an industrial establishment with 25 or more employees to prepare or revise a Safety and Health Policy in consultation with represen tatives of the employees. Section 6(8) of the OSH Act also states that the Chief Inspector may direct employers of fewer than 25 persons to also prepare a safety and health policy. Conse quently, the following information can be used as a guide in the preparation of the required document by all employers in Trinidad and Tobago.

What is a safety and health policy?

Your safety and health policy sets out how you manage safety and health in your organisation. It is a unique document that identifies who does what and when and how they do it. Pages 4-14 of this booklet give an example of a policy that you can use and keep in your workplace. How ever, you do not have to use this document or format, it is meant for guidance only. You are free to record and store the information in any form you choose. This format gives you an idea of the kind of information you need to record.



Your policy document should describe your arrangements, i.e. the systems and procedures you have in place for ensuring employees' safety and health. You may wish to refer to other documents, e.g. work rules, safety checklists, training programmes, emergency instructions, etc. All employees may not need to see all the other documents, but they must see the policy.



Why do I need a safety and health policy?

The safety and health policy is your starting point to managing safety and health in the work place, your general policy on safety and health at work and the organisation and arrangements for putting that policy into practice. Writing a safety and health policy is more than just a legal requirement, it is your commitment to planning and managing safety and health. It is the key to achieving and maintaining acceptable standards, reducing accidents and work-related illnesses and it shows our employees that you care for their safety and health.

Who should develop the policy?

With very few exceptions, the responsibility for safety and health rests on you as an employer. However, many day-to-day tasks may be delegated. Your policy should clearly identify how these tasks are allocated, but remember, you will still have ultimate responsibility. You should consult your employees, (through worker representatives) about the policy. Everyone should be able to see from the policy exactly who is responsible for different tasks, such as advice, reporting an accident and first aid, etc.

How often do I need to revise the policy?



It should be reviewed and possibly revised in the light of experience, or because of operational or organisational changes. It is useful to review the policy regularly (e.g. annually).

Do I need to do anything else?

Yes, you have other legal duties under other sections of the legislation. In particular, under the OSH Act Section 13(A), you have to assess the risks arising from your work activities and record the significant findings (refer to page 7 of this document). Depending on your type of work, there may be other specific legislation that will apply.

REMEMBER: What you write in the policy has to be put into practice. The true test of a safety and health policy is the actual conditions in the workplace, not how well the statement is written. You are also required to submit the policy and any revision thereof to the Chief Inspector and make it known to all employees. (Section 6(7) of the OSHA Act).

Safety and Health Policy

(This example Safety & Health Policy is for guidance only. Please note that this is not a generic template that you can just put your company's name on and adopt without any thought. Every business is different, you need to think through the hazards ad controls required for your business.)

Occupational Safety and Health Act Chapter 88:08

This is the Safety and Health Policy of:

(Name of Company)

SAMPLE

Our statement of general policy is:

- **To provide adequate control of the safety and health risks arising from our work activities**
- **To consult with our employees on matters affecting their safety and health**
- **To provide safe systems of work**
- **To provide and maintain safe plant and equipment**
- **To ensure safe handling and use of substances**
- **To provide information, instruction and supervision for employees**
- **To ensure all employees are competent to do their tasks and to give them adequate training**
- **To prevent accidents and cases of work-related ill health**
- **To maintain safe and healthy working conditions**
- **To review and revise this document as necessary at regular intervals**
- **To ensure commitment to safety and health issues**
- **To maintain safe transportation of articles**
- **To ensure continual improvement of employee working conditions**

Signed:

SAMPLE

(Employer)

(Date)

(Review Date)

Responsibilities

1. Overall and final responsibility for safety and health is that of

.....

*Your name must be inserted here. As the employer (i.e. sole trader, senior partner or managing director), you have overall responsibility for safety and health.

2. Day-to-day responsibility for ensuring this policy is put into practice is delegated to

.....

*If you are not always there, or do not have time to manage on a day-to-day basis, you can delegate this role to some one else, e.g. director, manager or supervisor. You will need to ensure that they keep you fully informed of safety and health matters as this will still be your overall responsibility.

3. To ensure safety and health standards are maintained/improved, the following people have responsibility in the following areas

Name Responsibilities

.....

.....

.....

.....

.....

*You may delegate functions to people within your organization, either by specific areas within the workplace or by topic. You should include their specific responsibilities in their job description. You must also ensure that they are competent to undertake their safety and health responsibilities and have adequate resources to enable them to do

SAMPLE

their job properly. It is important that responsibilities are clearly set out as this will make sure that if there are any safety and health concerns, they can be reported to the right person, and dealt with. You may wish to insert a diagram or chart showing your management structure/arrangements.

4. All employees must among other things:

(a) Co-operate with supervisors and managers on safety and health matters
(b) Not interfere with anything provided to safeguard their safety and health
(c) Take reasonable care of their own safety and health
(d) Report all safety and health concerns to an appropriate person (as detailed in this policy statement).

*Employees have legal responsibilities to take care of their own safety and health and that of others and to cooperate with you to help you comply with the law. Equally if employ ees have any concerns over safety and health issues, they should be clear about who they should tell so that the concerns can be addressed. [Ref: OSH Act Part II section 10].

Safety and health risks arising from our work activities

Risk assessments will be undertaken by:

.....

The findings of the risk assessments will be reported to:

.....

Action required to remove/control risks will be approved by:

.....

SAMPLE



SAMPLE

.....

will be responsible for ensuring the action required is implemented.

.....

will check that the implemented actions have removed/reduced the risks.

Assessments will be reviewed every:

SAMPLE

.....

or when the work activity changes, whichever is soonest.

***You must assess risks to the safety and health of anyone who may be affected by your work activities, so that you can weigh whether you have done enough or need to do more to comply with the law.**

[Ref: OSH Act Section 13(A)]. You will need to involve a number of different people, including your Safety represen tatives and employees, to do the risk assessment. You need to record the significant findings of your risk

assessments in a separate statement. Your policy document only records your arrangements for ensuring the assessments are done and are kept up to date. Once you have done your risk assessments, you must take the neces sary action to remove or reduce the risk as far as is reason ably practicable. For further information see "A Guide to Risk Assessment".

Consultation with employees

Employee representative/s is/are:

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SAMPLE

Consultation with employees is provided by:

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SAMPLE

*You must consult your employees. If you recognise a trade union and that trade union has appointed a safety representative, you must consult them on matters affecting the employees they represent. If you do not have trade unions, you must consult employees, either directly or through an elected representative [Ref: OSH Act Section 6(7)]. You may wish to use your safety and health commit tee or another meeting as a forum for consultation. See "Guidance on Safety and Health Committees".



Safe plant and equipment

.....

will be responsible for identifying all equipment/ plant needing maintenance.

.....

will be responsible for ensuring effective maintenance procedures are drawn up.

.....

will be responsible for ensuring that all identified maintenance is implemented.

Any problems found with plant/equipment should be reported to:

.....

.....

will check that new plant and equipment meets safety and health standards before it is purchased.

*You will need to ensure that all plant and equipment (e.g. lift trucks, vehicles, gas appliances, machinery guarding,

SAMPLE

ladders, electrical equipment, lifting equipment, air receivers, ventilation plant) that require maintenance (e.g. pre-shift checks, servicing, thorough examinations) are identified and that the maintenance is done. It may be worthwhile using a logbook to record the maintenance checks. When buying new or second hand plant and equipment, you must check it meets safety and health standards before buying it. [Ref: OSH Act Section 13].

Safe handling and use of substances

.....

will be responsible for identifying all substances which need a risk assessment.

.....

will be responsible for undertaking risk assessments.

.....

will be responsible for ensuring that all actions identified in the assessments are implemented.

.....

will be responsible for ensuring that all relevant employees are informed about risk assessments.

.....

will check that new substances can be used safely before they are purchased.



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Assessments will be reviewed every

.....

or when the work activity changes, whichever is soonest.

*You must assess the risks from all substances hazardous to health [Ref: OSH Act Section 6-(3)(4)(5)(6)].
These are known as your risk assessments. You should do assessments on substances you use (e.g. adhesives, paints, cleaning agents, solvents) and substances generated from work activities (e.g. dust, fume, vapour). Your assessment should identify any health risks. If there is a risk, you should take steps to remove or control the risk. Further, an employer should ensure that his employees are provided with health surveillance as appropriate. [Ref: OSH Act Section 25(K). All health records should be kept for 25years [Ref: OSH Act Section 75(1).

Information, instruction and supervision

Safety and health supervision of young workers/ trainees will be arranged/undertaken/monitored by:

.....

.....

is responsible for ensuring that our employees working at locations under the control of other employers, are given relevant safety and health information.

*You are required to have access to competent advice, either in-house or, if not available, external (e.g. employer organisations, trade associations, trade unions, consultants). If you have young workers and/or take on trainees or students to provide work experience, you will need to ensure that they are properly instructed and supervised. You must also undertake specific risk assessments for young people and you need to take account of their inexperience, lack of awareness of risks and immaturity [Ref: OSH Act Section 22; Sections 53-56]. If your employees go to work for another

SAMPLE

employer on your behalf (e.g. if you are a contractor), you will need to check that they are given relevant safety and health information for that location, by that employer/ company.

Competency for tasks and training

Induction training will be provided for all employees by:

.....

Job specific training will be provided by:

.....

Specific jobs requiring training are:

.....

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.....

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.....

Training records are kept at/by:

.....

Training will be identified, arranged and monitored by:

.....

*All employees must be given safety and health induction training when they start work. This can be combined with other useful information e.g. pay, leave, and hours of work). It needs to cover basic safety and health such as first aid and fire safety. Employees will need job specific training, which includes the safety and health aspects of the job. You also have to provide safety and health

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trainingfor people when riskschange, or periodically,e.g. if skills do not get used regularly. Some jobs will require additional special training (e.g. manual handling, driving, slinging techniques, confined space entry and asbestos removal). You may wish to refer to your company training programme. It is important to keep records of training, (even training you have provided in-house), to show that employees have received training. You should monitor the training records, so that refresher training is given when necessary.

Accidents, first aid and work related ill health

Health surveillance is required for employees doing the following jobs:

.....

.....

.....

Health surveillancse will be arranged by:

.....

SAMPLE

SAMPLE





Health surveillance records will be kept by/at:

.....

The appointed person(s)/first aider(s) is/are:

.....

All accidents and cases of work-related ill health are to be recorded in the accident register. The register is kept at:

.....

.....

is responsible for reporting accidents, diseases and dangerous occurrences to the enforcing authority.

***Employees must receive health surveillance for certain work (e.g. work with flour, lead, chrome, asbestos, noise, isocyanates and other hazardous chemicals).**

This will identify any health problems early on so that action can be taken before an employee's condition worsens.

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SAMPLE

Your risk assessments should identify all areas and the type of health surveillance needed. Your records should contain details of the employees, the health surveillance proce dures, dates and conclusions. The health care professional doing the surveillance will hold the actual medical records, as these are confidential. [Ref.: OSH Act Section 25K]. Providing immediate first aid can prevent minor injuries becoming major ones. It is a good practice to have a first aid box and an appointed person to take charge of first aid requirements. Recording accidents (even minor ones) and diseases means you can see whether you have a problem in a particular area. You must report certain types of accidents and ill health at work. [Ref: OSH Act Sections 46A and 48].

Monitoring

To check our working conditions and ensure our safe working practices are being followed, we will:

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.....

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.....

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.....

is responsible for investigating accidents.

.....

is responsible for investigating work-related causes of sickness absences.

SAMPLE

is responsible for acting on investigation findings to prevent a recurrence.

*You must be able to show that you are checking working conditions and systems of work, i.e. that you are monitoring safety and health. You can do this both actively and reactively, i.e. before and after something goes wrong. ACTIVELY: you or any other appointed person can carry out inspections, have reports submitted to you by managers, do spot check visits, safety representative inspections, etc. The safety and health committee has the right to carry out inspections and investigate accidents. REACTIVELY: You can investigate any accidents or sickness/absences that occur. Investigating accidents is a useful way of reviewing your safety systems. Ask yourself why the accident really happened and what you can do to stop it happening again. Similarly, if you have a number of employees absent because of similar ailments, this might mean there is a problem with their jobs causing ill health. When you find out what went wrong, put it right.

Emergency Procedures, fire and evacuation

SAMPLE

is responsible for ensuring the fire risk assessment is undertaken and implemented.

Escape routes are checked by/every:





Fire extinguishers are maintained and checked by/every:

Alarms are tested by/every:

Emergency evacuation will be tested every:

***You must carry out a fire risk assessment in the same way you do for safety and health risks.Your local fire service can tell you your obligations. For escape routes, extinguishers and alarms, you should state who checks, how often and also where they are based. You need a routine in case of fire or any other emergency evacuation. You should test your alarms and emergency evacuation procedures regularly. [Ref: OSHA Act Part V]. An emergency plan is required if you are an occupier, i.e. the person who has the ultimate control over the affairs of the industrial establish ment. [Ref: OSH Act Section 8(2)(b)].**



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Some key areas of risk

- Asbestos
- Chemicals
- Confined spaces
- Display screen equipment
- Electricity
- Excavation
- Falling objects/ collapsing strue tures
- Fire and explosion
- Machinery (including guard ing)
- Manual handling
- Noise
- Pressure systems
- Radiation
- Slips, trips and falls
- Stress
- Substances hazard ous to health (including dust, fumes, etc.)
- Temperatures
- Transport (including carrying dangerous substances, and pedestrians in the workplace)
- Vibration
- Violence to staff
- Work equipment
- Work-related upper limb disorders
- Working alone
- Working at heights
- Working environment

These are just some examples of key areas and not an exhaustive list. Look around your work place to identify other risk areas. If any risks apply to your work activities, you will need to do risk assessments to check that you have removed or reduced the risk.

FOR FURTHER READING SEE:

- A Short Guide for Employers
- A Short Guide for Employees
- A Guide to Risk Assessment
- Guidance on Safety and Health Committees

GETTING HELP

If any additional information is required, please feel free to consult with:

TRINIDAD & TOBAGO

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