

OSHA's VOLUNTARY PROTECTION PROGRAM—THE REWARDS ARE WORTH THE TASK

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THE PAPER INDUSTRY IS A MAJOR PARTICIPANT IN THIS PROGRAM THAT SUPPORTS STRONG EMPLOYEE SAFETY AND HEALTH INCENTIVES.

OSHA's VOLUNTARY PROTECTION PROGRAM (VPP) recognizes those industries that have demonstrated excellence in managing employees' safety and health. Attaining the VPP MERIT or STAR status is a considerable task, but the ensuing benefits more than outweigh the effort of the process. The most obvious benefits realized are reductions in work-related injuries, reduced workers' compensation costs, increased productivity, and employees having ownership in the safety and health process. The paper industry is one of the largest participants in the VPP and looks with favor upon its suppliers and vendors who have strong employee safety and health programs.

OSHA offers three levels of VPP participation. The separate levels allow companies to enter the VPP and over time progress to the highest, or STAR, level. The three levels are:

- **DEMONSTRATION** level for situations in which STAR program requirements may not be appropriate. Open to companies interested in exploring the use of the VPP. Demonstration participants are evaluated annually, and participation is limited to five years.
- **MERIT** level is designed for worksites that are willing to commit to achieving STAR qualifications. Open to sites in any industry covered by OSHA. Open to sites with injury rates above the national average if they have demonstrated the potential to reach the average. Merit participants are evaluated on-site annually. Successful completion of the MERIT program ensures eligibility for the STAR program.
- **STAR** level is for worksites with comprehensive, successful safety and health programs. Open to any industry and to companies with injury incidence

rates at or below the industry's national average. STAR participants are evaluated on-site every three years, with annual injury rate reviews.

Figure 1 shows the percentage of current VPP participants by level of participation.

Beloit Corporation's research and development facility, located in Rockton, IL, achieved the STAR status in OSHA's Voluntary Protection Program in 1996. The journey to the STAR began in 1992. Companies that are considering participation in the VPP may benefit from the experiences the corporation had during the VPP process. At the time we decided to go for the VPP, the application process was fairly new, and the task was considerably more difficult than it would be now.

The elements of the program, which have remained the same, are nothing more than a very good management system. Similar management systems are present in ISO9000 and ISO14000.

Any company planning to participate in the VPP should read all the available literature from OSHA and become an active member in the Voluntary Protection Program Participants' Association to better prepare for the challenge ahead. The goal of achieving the STAR has been so rewarding and beneficial to the Rockton facility that I am strongly encouraging all of our facilities in the United States to achieve STAR status in the VPP.

BENEFITS OF PARTICIPATING IN THE VPP

The incentives for a company to become involved in the Voluntary Protection Program may vary from company to company, but there are certain benefits that are universal:

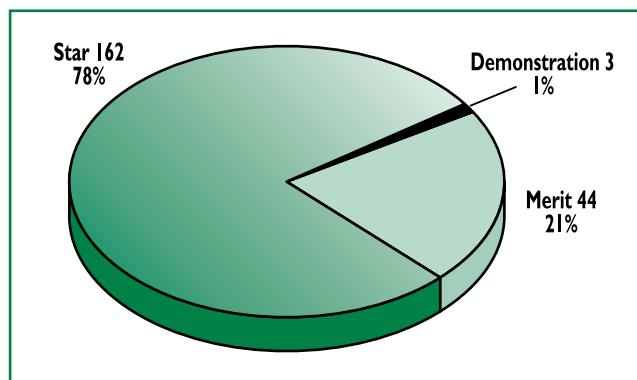
- Improved employee morale has to be near the top of

the list when benefits of participation are considered. Workers appreciate management providing a safe and healthy workplace. We all enjoy going to a workplace that is clean, neat, and orderly, knowing that management has a genuine concern for our safety and health. That concern is demonstrated in a variety of ways: appropriate training, visible and active participation in the safety and health process by management and supervision, adequate resources to support the process, and a work environment that allows employee participation and ownership in the safety and health program.

- A reduction in injuries and costs related to those injuries is a definite plus. Traditionally, VPP participants have experienced lost workday case rates 60% to 80% less than their industry averages. Obviously, reductions of this significance will equate to considerable savings in workers' compensation costs. **Figure 2** shows the amount saved by VPP participants in comparison to industry averages.
- Enhanced status with your customers and an edge on the competition is worthwhile. The paper industry is well represented in the VPP, as the pie chart in **Fig. 3** shows. Logic dictates that an industry that is so proactive in employee safety and health will view favorably its suppliers that are also proactive in this area and are participants in the VPP. This benefit is one of the major reasons that Beloit Corporation is strongly encouraging all of its U.S. facilities to become active in OSHA's VPP.
- Realizing greater productivity because of fewer days away from work due to injuries is important. With the possibility of dramatic reductions in lost workday injuries, a company can keep the experienced and trained workers at their jobs and not have less experienced, temporary workers covering for the days away from work. **Figure 4** compares actual lost workdays from injuries at VPP sites against overall industry averages.

There is another "softer," less measurable productivity advantage that VPP participants will realize, and it is closely tied to the employee morale benefit. Employees who feel safe while at work and feel good about the attitude that management has toward their safety and health will be more focused on their jobs and thus more productive.

- Recognition as an employee safety and health leader in the community bolsters the image of the company. Good news spreads rapidly! VPP participants gain almost instant recognition in the community as role models in employee safety and health. There are approximately 200 sites in the VPP nationwide, so when a company gains STAR or MERIT status, everyone



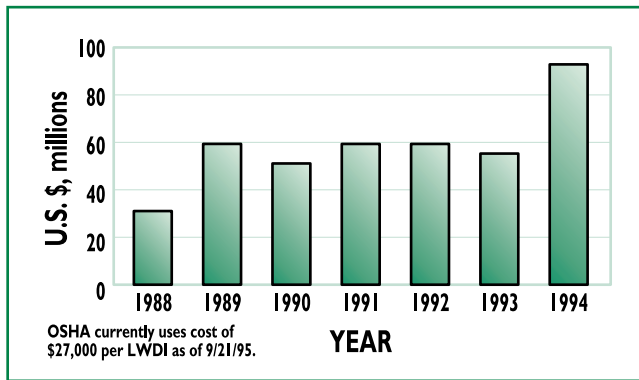
1. VPP participants as of Sept. 21, 1995

in the community is aware of that achievement. Other companies will start inquiring about the program and looking to that company's recognized safety professionals for feedback and advice. **Figure 5** indicates the growth in number of participating companies in the program.

- Communication improves between management and employees under the program. Employees see themselves as part of the solution instead of part of a potential problem. A well-informed workforce responds as an equal partner in the safety and health program. A reciprocal openness and credibility develops between management and the employees. It evolves from a system of "finger-pointing" and "who is to blame" to one of "we've got a problem, let us find a solution." The program progresses from one of confrontation and reaction to one of partnership and pro-action. It becomes a win/win situation for the entire company.
- participating company and OSHA. Beloit started cultivating a cooperative relationship with OSHA several years before active consideration was given to the VPP. The Safety Department developed a philosophy of contacting the area OSHA offices to seek advice when specific safety issues arose. After a couple of years, a mutual respect developed between our safety professionals and the area directors and OSHA compliance officers. This open communication has never exempted the company from on-site inspections, but the local OSHA offices are familiar with the efforts that the company makes toward employee safety and health. In 1995 Beloit sponsored a three-day safety seminar for local industries. The OSHA area office was a co-partner and very active participant in this seminar.

Developing an open relationship with OSHA is a concept that some companies find difficult to understand. The question is often asked, Why would I want to invite OSHA into my facilities to make an inspection? This fear is usually unfounded. If your safety and health program is good enough that you are considering participation in the VPP, it is probably at a level acceptable for OSHA to do an on-site evaluation. This phase of the

SAFETY



2. US\$ (in millions) saved by VPP participants compared to industry averages

process will be discussed later.

- Providing a safe and healthful workplace is the right thing to do! This is a clear and obvious statement that speaks for itself.

IS YOUR SAFETY AND HEALTH PROGRAM GOOD ENOUGH?

Prior to considering application to the VPP, the safety department or safety committee should do a self-evaluation of the safety and health program. This can best be accomplished by contacting the OSHA VPP manager of the appropriate OSHA regional office. The VPP manager will be a key resource as you proceed through the evaluation process, make the application, and continue through the on-site evaluation. The VPP manager will guide you through the entire process and assist you in developing an application in the format required by that office.

There are certain basic elements that must be in place and functional before you will qualify for the VPP:

Incidence rates

The total injury incidence rates and lost workday injury case rates must be at or below the averages for like industries.

Management commitment/leadership

There are a number of items that must be in place relating to management commitment and leadership:

- Employee safety and health must be integrated into the overall business strategy.
- Managers at all levels must be visibly supportive and actively involved in the safety and health program.
- The necessary resources must be available to support a proactive safety and health program.
- Safety responsibilities must be specifically assigned, with documented accountability from top management through line supervisors.
- A written safety mission/policy statement signed by the top manager must be displayed at the facility.

Safety and health program

A written safety and health program that addresses all the elements appropriate to the size of your site and your industry is necessary.

Employee participation

Employee participation should be broad-based. Employees should be actively involved in all phases of the safety and health program, including safety committees, accident investigation, hazard analysis, inspections/audits, problem resolution, safety training, etc. Employees should be attending to the day-to-day safety program needs of your facility. Employee participation and ownership in the safety and health process is key to a vibrant, proactive program.

Safety and health training

Safety and health training must go beyond the regulatory requirements. If managers, supervisors, and employees are expected to take an active part in the safety and health process, they must be given the tools to meet their responsibilities. Training in all aspects of safety and health appropriate to their level of responsibility is critical. Training and education fosters confidence in one's ability to perform to expected standards. As managers, supervisors, and employees gain confidence in their abilities, they will seek greater involvement in the process, which has a very positive domino effect.

Worksite analysis

A methodology should be developed to evaluate all existing or potential hazards within the workplace. All jobs, operations, and processes should be evaluated from an employee safety and health perspective. A job safety analysis should be performed for all existing jobs. A pre-use analysis should be a part of all new processes and should be initiated and integrated at the planning stage. Routine safety inspections should be performed on a scheduled basis with written documentation, correction tracking, assignment of specific responsibilities for correction, and a completion date.

A simple, written reporting system should be developed so employees can pass on their concerns and observations for remedial action and feedback to the reporting employee.

Accident investigations with written documentation can be an integral part of the worksite analysis system. Identifying accident causes and developing remedial actions are an important part of the worksite analysis process.

Hazard prevention and control

The prevention and control of hazards can be addressed in a variety of ways. Access to qualified

safety professionals, written safety policies and procedures, hazard correction tracking systems, medical services for injured employees, and a consistent disciplinary system are some of the methods of prevention and control. This is a critical element of a proactive safety program, and the OSHA on-site evaluation team will devote a considerable amount of time to this element.

Program evaluation

There must be a system in place to benchmark and measure the effectiveness of the safety and health program. The program should be compared to world class programs in similar industries and measured against itself for continuous improvement.

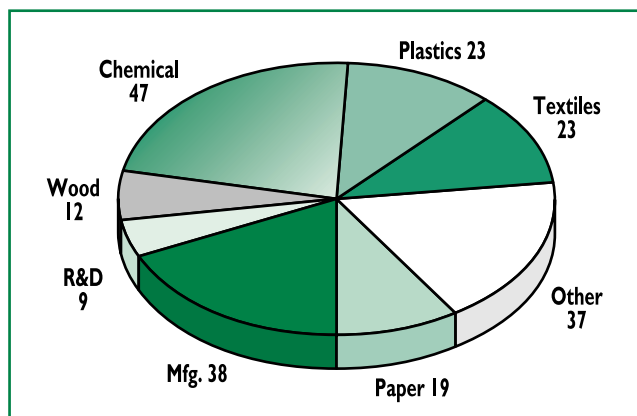
If your self-evaluation reveals a strong safety and health program in all of the areas mentioned above, you may be in a position to consider an application for the VPP. But is your program really as good as you think it is?

EMPLOYEE PERCEPTION SURVEY

What are your employees' perception of the program? Safety professionals and others closely involved in the safety and health program may have biased perceptions of how good the program actually is. What do customers (the employees) think of the program? Isn't that really where the success of a safety and health program should be measured?

Beloit has found the employee perception survey to be a helpful tool in evaluating how its employees perceive the safety and health program. The survey we have utilized is a product of the National Safety Council called the Safety Barometer. The survey consists of 50 questions that can be easily administered to the workforce. The responses are anonymous to encourage complete honesty. The surveys are sent to the National Safety Council for analysis, and the results are measured against its national database to determine how a given company ranks with others nationwide. The Safety Barometer is just one of several types of surveys the National Safety Council has available.

Beloit's survey was initially administered at our research and development facility in Rockton, IL. We wanted to see where the employees perceived our program to be weak so we could concentrate our efforts in those areas prior to the OSHA on-site evaluation. The survey did just what we wanted it to do, and we were able to strengthen the perceived weak elements. When the results of our survey were compared to the national database, we were at the 75th percentile. We also realized an unexpected reward from the survey. A renewed interest in the safety program began to develop. Employee feedback indicated an appreciation of the fact that we



3. Industries in the VPP

wanted their opinions on how the program was functioning.

This facility entered the VPP program at the MERIT level, with five areas identified for improvement for consideration for the STAR level. The next year was devoted to working on the five areas. When we felt we were ready for an on-site evaluation for the STAR, the identical employee perception survey was again administered to the workforce. The results of this survey put us at the 100th percentile in the National Safety Council's database, so we knew we were ready for the on-site evaluation. This facility is now at the STAR level.

We continue to do the Safety Barometer on an annual basis to make sure we meet the needs of our employees. The last survey again put us at the 100th percentile, and the program is even stronger than before.

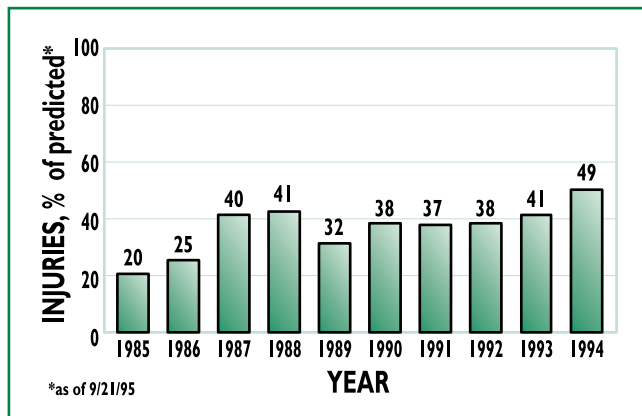
Beloit has a facility in Massachusetts that is preparing for the VPP. The Safety Barometer has been administered at this facility to baseline its program and identify the weaker elements for focused attention.

Experience has demonstrated the employee perception survey to be an excellent tool in evaluating our safety and health programs. Baseline surveys have been done at two other locations that are anticipating application for the VPP.

THE APPLICATION PROCESS

After the safety program self-evaluation has been completed, a baseline employee perception survey has identified those elements of the program that need work, and remedial action is being taken, the time has arrived to start the application process. I recommend the following application procedures:

1. Arrange an initial meeting with the regional OSHA VPP manager. This will initiate a relationship that is critical to the entire VPP process. This meeting should be attended by one of your company's safety professionals, a management representative, and an employee representative. All in attendance should



4. Lost workday injuries for all VPP sites; actual injuries as percentage of predicted, based on average for SIC

have been involved in the self-evaluation process so they are very familiar with the program. If the employees are represented by a labor union, it may be beneficial to have the chairman of the union committee also present. This type of representation sends a good message to the regional VPP manager. The objectives of this initial meeting should be to establish a format for the application, discuss the VPP process, voice any concerns you may have relating to your safety program, and spend enough time to develop a comfort level among all participants, because this group will be working very closely over the next several months.

2. Establish a team to develop the application. It may be the same people that attended the initial meeting, or perhaps more people will get involved in the application process. The application team should not be larger than four or five, and someone has to be the designated facilitator.
3. Develop a timeline with milestones and a date of completion. This process has to be orderly and time sensitive. If not, it will flounder and interest will wane. Regularly scheduled meeting times should be established at the outset. Initially, weekly meetings will be appropriate. As the process gains momentum and nears completion, meetings can be adjusted to an "as needed" basis.
4. Keep lines of communication open with the OSHA VPP manager. The VPP manager will have suggestions as the application process evolves. The application team will have a myriad of questions that need to be answered during the task.
5. All the elements specified above must be addressed in the application. These elements are essential to a good safety program. The elements not only have to be in place, they have to be functioning. Functioning implies more than written programs that cover the essential elements. The programs have to be "driven" down into the organization, supported by manage-

ment and supervision, and practiced on a daily basis by the work force.

6. Keep the workforce informed of the progress of the application. Open, two-way communication is important to the safety process. Utilize the bulletin boards, tool-box talks, in-house newsletters, etc., to broadcast the message. Don't limit your communications to just the progress of the application process, but include all aspects of safety and health activity, good or bad.
7. A letter of support from the labor union committee will be required. The bargaining unit must support the VPP efforts, and that support must go beyond the authoring of a letter of concurrence. Support should be demonstrated on a daily basis, by participating in safety committees, encouraging members to work safely, and supporting programs that promote good safety and health. Attempting VPP participation in a confrontational management/labor environment is a futile task. An open, cooperative management/labor relationship must be in place well before the VPP process begins.
8. The proper method of application submission will be largely dictated by the regional OSHA VPP manager. If possible, the same team that made the initial visit should deliver the application. It will give the team an opportunity to discuss the application with the VPP manager and answer any immediate questions that may arise. Questions and concerns relating to the on-site visit can also be discussed at this time. Normally, the on-site visit will not be scheduled for several months after the application is submitted. The application has to be reviewed by a number of officials before it is accepted. When the application is accepted, the VPP manager will tentatively schedule an on-site evaluation.

THE ON-SITE EVALUATION

Remember, this is not an OSHA inspection. The evaluation team will be critiquing your program to assure that it is fostering and maintaining a safe and healthy working environment. If hazards are observed, they will serve as indicators that some element of your program may need improvement.

The OSHA evaluators will not issue citations, but don't expect them to ignore hazards. They will work with you to determine how and when the hazards will be corrected. If the correction will take longer than the on-site evaluation, they will ask to be notified when the correction is made.

The on-site evaluation will include several steps:

Initial meeting

The team, which will consist of a team leader (usually the VPP manager), a safety specialist, and an industrial hygienist, will hold a brief introductory meeting. The team leader will describe the evaluation process and what the team expects to accomplish. Upper management, safety professionals, safety team members, labor union representatives, and other employees who have been involved in the VPP process should attend this meeting.

Document review

Prior to the on-site evaluation, OSHA representatives will confer about materials and documents the team will want to review. The material should be available for the first day. The document review will take from one-half to one day, depending on the size of the company. A conference room should be made available for the team to utilize during the entire visit.

The documents typically requested can be quite varied. These documents should be presented in an organized, logical, and attractive manner. First impressions are important, and how the company presents itself and responds to requests on the first day of the evaluation will carry through for the entire visit. There should be at least one safety professional and one labor representative available to the team during the entire evaluation process. It may be advantageous to have an experienced site manager available to answer any technical process questions that may arise.

At the end of each day, the evaluation team will meet with company representatives to discuss the day's activities and what remains to be done.

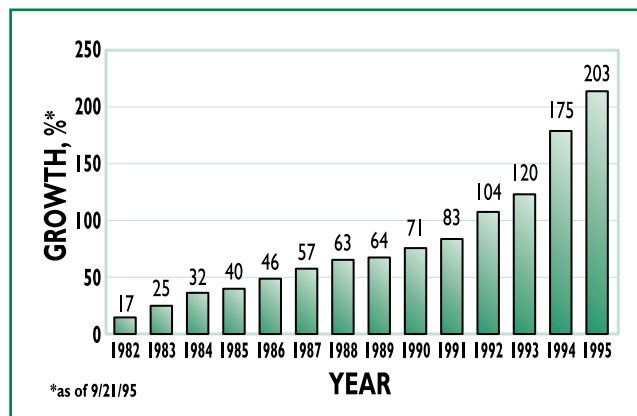
Walkthrough

The team will walk through your facilities to make sure the program is fully functional. During the walkthrough, the team members will conduct brief, informal interviews with randomly selected employees at or near their workstations. These interviews are one-on-one, and the team members will ask that the interviews be conducted in this manner, so the employee does not feel threatened. I recommend certain company representatives accompany the evaluation team during this inspection: a safety professional from the facility; an experienced, knowledgeable manager; a union representative; and the maintenance supervisor.

This phase of the evaluation will usually take one to two days, depending upon the size of the facility.

Formal interviews

Formal interviews will be requested with a number of employees representing all levels of the organization. The interviews will be held privately and will last from 20 to 30 min. The purpose of the interviews, obviously, is to determine employee awareness and participation in



5. Growth of VPP participants by year

the safety and health program.

How employees perceive and respond to the safety and health process is the most critical aspect of the program. If employee knowledge and participation is minimal, chance for approval is very small.

Draft report

Often the evaluation team will develop a draft report on the final day of the visit. They may need assistance such as a computer and printer. You will have the opportunity to review and discuss the draft report before it is finalized.

Closing meeting

Prior to leaving, the team will have a final meeting with company representatives. Those attending should be the same representatives who attended the initial meeting. The team leader will discuss their findings and recommendations. The draft report will be shared if it has been prepared.

The team leader will advise the group as to what their recommendations will be to the OSHA director. There are four recommendations that can be made:

1. The company does not meet the requirements of the VPP
2. Additional work has to be done before a recommendation will be made, and a time period will be set for improvements to be made
3. A recommendation is made to enter the VPP at the MERIT level, or
4. A recommendation is made to enter the VPP at the STAR level.

If a recommendation is made to enter the program at the MERIT level, there may be specific goals set that the company has to reach to get to the STAR level.

The vast majority of the time, when the process has gone through the on-site evaluation, the recommendation will be either at the MERIT or STAR level.

LIFE AFTER "STAR"

Congratulations! Whether you have entered the VPP at the MERIT or STAR level, you are with a very elite group of companies. VPP companies are usually world-class in a variety of areas if they have an outstanding safety and health program. Excellence cannot function as an island. What you have accomplished in this area in the way of employee empowerment and involvement usually spills over into other areas and continues to make the company stronger and more vibrant.

There is a tendency, however, to relax and rest on one's laurels after a difficult task has been successfully completed. If this is allowed to occur, complacency can creep in, and the program will cease to improve. This process is a never-ending journey in which we always strive for continuous improvement!

Celebrate your accomplishment! Plan a dedication ceremony after formal acceptance by the OSHA director, so the VPP flag and plaque can be presented in an atmosphere of celebration to be enjoyed by the entire workforce. After all, it is the entire workforce that makes such accomplishments possible.

Finally, I would recommend joining the Voluntary Protection Program Participants Association and becoming involved in their many activities. Take the opportunity to attend the regional and national conventions and network with those companies that are actively involved in the VPP. Their enthusiasm and dedication toward improving employee safety and health is truly uplifting. You will witness firsthand the many benefits of being among the elite in the VPP.

You can become involved in the Voluntary Protection Program Participants Association by contacting them at 7600 E. Leesburg Pike, Suite 440, Falls Church, VA 22043, telephone +1 703 761-1146. **TJ**

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