



Commonwealth of Massachusetts Executive Office of Labor and Workforce Development Department of Labor Standards

Executive Order #511 Gap Analysis Health and Safety System Ideals

Upper Management Support and Policy

Upper management is aware of this hazard to employees. Upper management has implemented measures to protect employees from this hazard, ideally creation of a written policy based on the appropriate technical standard as outlined below. Upper management has supported efforts to implement the measures outlined in the policy.

The agency has implemented and management supports a comprehensive policy (written preferred) requiring all of the necessary elements (employee actions, equipment, other controls, inspection and maintenance, etc.) to protect employees from this hazard. This policy is based on the appropriate technical standard or guideline. Everyone in the hierarchy from the most senior manager to front line workers knows the details of the employee protections outlined in this policy, and knows that use of these protections is required.

If any specific written plans or procedures are required by the standard, these have been developed and implemented, employees are aware of the details of these procedures, and know that they are required.

Accountability

Accountability is such that management is fully aware of whether or not necessary employee protections are being followed, and takes proactive measures to gain this knowledge (e.g., random inspections of work sites). This includes senior management and daily supervisors. Employees at all levels are held accountable for use of necessary employee protections.

In detail:

- The agency (employer) has clear requirements for what health and safety procedures (including use of protective equipment) employees should use to protect themselves from this hazard.
- Managers and staff at all levels of the hierarchy have comprehensive knowledge of these health and safety requirements.

- The agency (employer) has current and accurate knowledge of how well health and safety procedures are being followed on the job on a day-to-day basis. This can occur through supervision, periodic observation of employees in the field, or equivalent means.
- The agency (employer) encourages use of required health and safety procedures through reminders, positive reinforcement measures and disciplinary procedures as a last resort.
- The agency (employer) creates a health and safety culture such that employees at all levels are comfortable speaking up when health and safety procedures are not available or are not being used, with no fear of reprisal. This also includes employees feeling comfortable in encouraging fellow employees who are not following health and safety procedures.

Use of a Technical Health/Safety Standard

The agency has identified the appropriate technical standard or guideline to protect employees from this hazard. There is comprehensive knowledge of all elements of this standard within the agency, and these elements serve as the basis for protecting employees from this hazard.

Training

With a training requirement as part of the appropriate technical standard or guideline for this hazard.

100% of affected employees have received training as required by the technical standard or guideline. This means that all of the required topics, required student proficiencies, and/or required training hours as per the technical standard or guideline were included as part of the training.

If no formal training requirement as part of technical standard or guideline.

- ▶ All employees have been fully trained to:
 - Recognize this hazard for all of their work tasks and work locations.
 - Know all of the necessary protections/controls required for them from this hazard for all of their work tasks and locations.
 - Know how to use or implement necessary protections/controls that require an action from the employee. This includes how to use the specific safety or personal protective equipment provided to the employee, or how to follow specific safety procedures.

- What actions to take/who to contact if protections are not in place/available or if there is an emergency with this hazard.
- ▶ Training was/is conducted by a qualified trainer and is technically accurate and understandable to the audience.
- ▶ All new employees are trained prior to any exposure to this hazard.
- ▶ Employees are retrained with sufficient frequency so they retain all of the knowledge described above. This will vary depending on how often the employees actually use the information they learned in the field. The less frequently it is actually used, the more people forget. Annual retraining is ideal, re-training less than once per five years, for example, is unlikely to result in retention of knowledge.

Controls – Administrative

All of the required administrative controls have been implemented, and they are used 100% of the time when required.

If there is an accident or near miss with this hazard, it is important to assess what occurred and the cause(s) for the accident, and to implement necessary corrections immediately.

Controls – Engineering

All of the required engineering controls are in place. They are always tested, inspected, and maintained regularly, as per manufacturer's instructions or equivalent. If employee action is required to initiate the engineering controls (such as turning on a switch for ventilation), employees are trained in when and how to use the control, and employees always use the control when it is required.

Controls - Equipment

Have Safety Equipment

The agency owns or has access to safety equipment as follows:

- Equipment meets all required certifications.
- Equipment meets all criteria as outlined in the technical standard for this hazard.
- All of the necessary types of equipment are available to cover all situations exposing employees to this hazard.
- Sufficient equipment to cover all of the simultaneous work situations exposing employees to this hazard is available.
- Equipment is inspected before each use and maintained as per manufacturer's instructions.

- Equipment is in good condition, meaning it can still perform the protective function as intended.
- Equipment is replaced when no longer in an acceptable condition as described in the bullet above.

Use Safety Equipment

The necessary equipment is used 100% of the time in every situation in which it is required.

Have Personal Protective Equipment

The agency has available personal protective equipment (PPE) as follows:

- PPE meets all required certifications.
- PPE meets all criteria as outlined in the technical standard for PPE and/or this hazard.
- All of the necessary types of PPE are available to cover all situations exposing employees to this hazard.
- Sufficient PPE is available for simultaneous use by all employees in situations requiring PPE.
- PPE is inspected before each use and maintained as per manufacturer's instructions.
- PPE is in good condition, meaning it can still perform the protective function as intended.
- PPE is replaced when no longer in an acceptable condition as described in the bullet above.

Use Personal Protective Equipment

The necessary equipment is used 100% of the time by every employee in every situation in which it is required.