Making the Annual Self-Evaluation Work for Your Site
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  • EHS Manager
Workshop Objectives:
You will know:

• What OSHA (DOSH, AK-OSH, OR-OSHA, DOE) is looking for in the VPP Self-Evaluation process;
• How to complete ANY annual self-evaluation;
• How to make the annual self-evaluation work for you;
The VPP process is unique . . .

creating models of excellence to benefit workers worldwide.
GEAR UP FOR VPP!

All parts work together to make the whole system operate smoothly.
VPP ANNUAL SELF EVALUATION PURPOSE

CONTINUOUS IMPROVEMENT
WHAT IS IT?

• A CRITICAL AND COMPREHENSIVE, MEASURED EVALUATION OF YOUR SAFETY AND HEALTH MANAGEMENT SYSTEMS AND Your INTERNAL CONTROLS.
Why Evaluate?

- **Smart Business Practice**
  - How do you know where you’re going if you don’t know where you’ve been?

- **Requirement of VPP (by February 15)**
  - Submit annual injury & illness incidence and lost workday case rates
  - Number of injuries & illnesses
  - Hours worked and average employment
  - A copy of the most recent S&H Program Evaluation
  - Same for applicable Contractors on site
Benefits of Self-Evaluation

• Helps ensure ASEs are conducted for continuous improvements.
• Helps ensure closure.
• Provides direction for the future and continuous improvements.
• Organizes safety related activities.
• Provides a comprehensive summary that can easily be shared with employees.
• When employees are involved, it promotes:
  – Perception of the importance of safety
  – Confidence in our ability to reduce hazards
  – The value of our safety culture
“The safety culture of an organization is the **product of** individual and group values, attitudes, perceptions, competencies, and patterns of behavior that determine the **commitment to**, and the **style and proficiency of**, an organization’s **health and safety management.**

“Organizations with a **positive safety culture** are characterized by communications founded on mutual trust, by shared perceptions of the importance of safety and by confidence in the efficacy of preventive measures.”
Cultures Influencing Safety Culture
What a positive Safety Culture looks like in action

The System is:
Management Led
Employee Driven
We each understand our roles
Authorized to do the work
Competent to do the job
Priorities are balanced
Rules/requirements understood
Hazards Controlled
... Self Sustaining

Together, We:
Understand the work
Evaluate the Hazards
Control or eliminate the hazards
Work within the controls
Provide each other with feedback
... Continuously Improve
Annual Self-Evaluation

• Not a compliance audit.
• It is a **critical review** to assess the effectiveness of all VPP elements and sub-elements
  • analyze participant and contractor injury and illness data and trends.
• Include a review of written programs, a walk-through of the workplace, and interviews with employees.
Evaluation Process

• Written Report in narrative format

• Assess the effectiveness of all elements/sub elements.

• Conducted by competent person (corporate, site, or third party) trained and or experienced in performing such evaluations

• Evaluation form available on line!
Go beyond compliance
SHARP and VPP programs

VPP documents

Benefits to employers
Types of consultations
What to expect
What employers are saying

GO BEYOND COMPLIANCE
Safety and Health Achievement Recognition Program
SHARP documents
SHARP testimonials
Voluntary Protection Program
VPP documents
VPP participants

Documents
Application packet
Fill-in VPP site assessment report
Industrial hygiene self-assessment
Oregon VPP Policies & Procedures (Program Directive 241)
Overview information for Oregon VPP
Annual Self-Evaluation Submission Guidelines
Gear Up poster

More
★ VPP participants
© Federal OSHA VPP
© National VPP Participants Association

Logos
Small logo
Medium logo
Large logo
For Each Element and Sub Element, Ask Yourself:

• 1. Is it comprehensive?
• 2. Is it operating effectively and meeting established goals and objectives?
• 3. Are there problems that require developing and implementing solutions to maintain excellent worker protection and continued VPP eligibility?
• 4. What improvements can be made to make it even more effective?
• 5. What goal modifications should be made for the upcoming year?
Involve Employees

• Ongoing, throughout the year

• Teams or individuals, for multiple and varying viewpoints

• Write some sections, review other sections

• Safety Committee should review and authorize for management review
### 1) Management Leadership and Employee Involvement

#### C) Goals, Objectives, and Planning

**Description / Activities:** Transportation management sets new HSE performance goals and initiatives yearly, as well as throughout the year based on several different processes. Goals and initiatives are placed with the intent of learning from opportunities and increasing HSE performance. Examples of processes used to identify opportunities include Tier II and Tier III audit findings, Operational Excellence audit findings, incident trends, investigational findings, leading and lagging indicators, and survey information to name a few. The 2014 HSE performance goals have been set and passed to each division. Each division is currently in the process of identifying and developing goals that will support the Business Unit goals. Once the division has established their goals, facilities such as [redacted] and personnel assigned to [redacted] will identify what facility and personal goals need to be set in order to achieve the established targets.

**Assessment of Effectiveness:** The processes within this area are effective and integral to maintaining our continued success in HSE. The HSE Management System Evaluation survey was conducted at the division level which gave facility managers a chance to identify opportunity areas, as well as establish facility goals.

**Recommendations for Improvement:** The HSE Management System has been traditionally executed at the Business Unit level. This approach does not identify gaps at a level which is conducive to developing division specific goals. The HSE MS assessment tool will be modified, and the assessment will be conducted at the division levels in 2014.

**Owner(s):** [redacted]

**Target Date for Completion:** 12/31/2014
2) Work-Site Analysis

g) Trend/Pattern Analysis

**Description / Activities:** All recordable incidents are stored in an Incident Database.

**Assessment of Effectiveness:** This allows us easy access to review periodically similar incidents involving plant operations to make sure that they are not doing the same thing that caused the incident. It is the responsibility of the Department Supervisor to keep their department updated and trained so the same issues don’t keep reoccurring.

**Recommendations for Improvement:** Update database to work with new hardware and software.

**Owner(s):** [Redacted]

**Target Date for Completion:** 6/1/15

8) Hazard Prevention and Control

g) Emergency Preparedness

**Description / Activities:** We have defined ER procedures, Response plans in place with local authorities, evacuation plan, and hold annual response drills.

**Assessment of Effectiveness:** Systems are effective.

**Recommendations for Improvement:** Update response plan with police, fire and hospital contact information.

**Owner(s):** [Redacted]

**Target Date for Completion:** 12/31/15
2) Work Site Analysis  
g) Trend/Pattern Analysis  

**Description / Activities:** All observations, near misses, property damage, and injuries are recorded in our TRAX information system. This system allows us to produce a variety of reports, charts and graphs that we use for communication and training. The safety team acquires trends from the safety database (TRAX) and reports them. We also have discussions with the leadership team and hourly staff when we have repeat events or specific trends are occurring. Data mined as a result of tracking and trending is used as a communication tool and in focusing specific training and or resources to problematic areas.

**Assessment of Effectiveness:** This process is effective. In 2018 five out of six of our property damage incidents involved broken windshields on mobile equipment. Each case had a different root cause with different corrective actions. This data has been included in our Mobile Equipment training to increase awareness of ‘what could happen’.

**Recommendations for Improvement:** Continue to use learning events in our safety training.

**Owner(s):** Leadership team  
**Target Date for Completion:** Ongoing

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3) Hazard Prevention and Control  
g) Emergency Preparedness  

**Description / Activities:** Our emergency action plan covers preparation and training for events including fire, power outages, medical, bomb threats, and combustible dust related events. We conduct fire evacuation drills on an annual basis. After the drills, we discuss any issues/learnings and the drill is documented. Our planer mill conducts Dust Collection System/bag house emergency drills bi-annually. We have collaborated with our local fire department to provide hands-on fire extinguisher training for our team mates. Our local fire department has toured our planer facility and is prepared to respond to a dust collection system emergency. The local fire department is also provided an inventory of all our chemicals used at the mill to prepare them for a chemical emergency.

**Assessment of Effectiveness:** The process is effective. We have an agreement with our local fire department that if we have a bark pile fire (smolder, smoke or flame), as long as people or assets are not in danger, we will notify them and extinguish with our own equipment.

**Recommendations for Improvement:** Conduct some ‘scenario’ drills throughout the year to practice real life emergencies.

**Owner(s):** 
**Target Date for Completion:** December 2019

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**Improvements have been NOTED since Grading System Shared!**
### My Grading System

<table>
<thead>
<tr>
<th>Outstanding</th>
<th>Very Good</th>
<th>Average</th>
<th>Acceptable</th>
<th>Needs Work</th>
</tr>
</thead>
<tbody>
<tr>
<td>Detailed description of elements</td>
<td>Solid description of elements</td>
<td>Basic description of elements</td>
<td>Brief description of elements</td>
<td>Inadequate description or missing elements</td>
</tr>
<tr>
<td>Improvement recommendations on &gt;70%</td>
<td>Improvement recommendations on 40-60%</td>
<td>Improvement recommendations on 25 – 40%</td>
<td>Few improvement recommendations &lt; 25%</td>
<td>No improvement recommendations</td>
</tr>
<tr>
<td>3 years of rates</td>
<td>3 years of rates</td>
<td>3 years of rates</td>
<td>1 year of rates</td>
<td>No rate information</td>
</tr>
<tr>
<td><strong>COMPREHENSIVE, Self Critical, looking to improve</strong></td>
<td><strong>COMPREHENSIVE, Self Critical, looking to improve</strong></td>
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</tr>
</tbody>
</table>

You are already a VPP site, you don’t need to tell me the element is ok and does not need improvement. I am more interested to know that you are not satisfied with where you are and that you are indeed looking to improve.
The choice is yours:

- **D.** Barely adequate description of activities,
  - few improvement recommendations.
  - Minimal mentoring activity.

- **C.** Basic description of activities,
  - Nearly ½ with recommendations for improvement.
  - Some mentoring, internal and external, support of networking activities.

- **A+.** Very detailed description of activities,
  - Recommendations for improvement on all.
  - Strong mentoring with multiple external and internal sites, SGE participation, leadership in networking opportunities and robust conference participation.
Speaker

• Cliff L. Butler, SGE
  – Sherwin-Williams – Portland, Oregon
  • EHS Manager
Eliminate the *audit-to-audit* sine wave
Eliminate the sine wave

• Schedule and accomplish some type of self-examination every month, all year long
  – Program reviews
  – Mimic on-site evaluation techniques—use OSHA’s checklists
  – Consider spotlighting VPP sub-elements not covered by your program review process
  – Share the workload—team participation leads to better results
Utilize Employee Led Safety Committees

- Have a team(s) assigned to monitoring and closing Self-Evaluation.
- Assign a senior management champion to assist, expedite and fight for the team(s) needs.
- Report progress through a Central Safety Committee monthly/quarterly.
Use the Self-Evaluation for Continuous Improvement

• Consider Safety Kaizens focused on VPP Self-Evaluation improvement recommendations
  – A specific time commitment to focus on a process, piece of equipment, area of repeat safety incidents, etc.:
  – Ergonomics
  – Guarding & Signage
  – Lighting & general work environment of the area
  – PPE and/or engineering improvements
  Any areas you noted for improvement.
Eliminate the sine wave

• What are your peers are doing?
  – Arrange to swap reports with other VPP site EH&S managers
  – Ask an SGE to review before submitting
  – Make sure your company is aware of the ASE and a process for review of the ASE is done.
  – Incorporate recommendations for improvement into your annual EHS Plan
Engaging Employees

• Involve new employees in committees
  • Issue invitations to committee meetings
• Conference attendance
  – Local opportunities exist through the ASSP, local SHARP and/or VPP companies
  If local opportunities aren’t available, START A GROUP.
    - Reach out and create opportunities for improvement with others
Eliminate the sine wave

• Consider report-back to management and safety committees on self-assessment progress on a scheduled basis

• Establish goals for safety committees tied to the ASE
  – Measure and report the progress
The key to building and sustaining a strong safety culture is mentoring.
All the tools necessary for a strong safety program are foundational to VPP. How we use the tools makes the difference between success and failure.
QUESTIONS??????

Comments??

Comments??