

For even the most ambitious supervisor, reviewing and updating the entire library of an employer's policies and workplace safety programs can cause much frustration. As quickly as one can research, draft, edit, re-edit, and finally get that shiny new policy approved, a new law or standard change quickly renders all that work outdated and due for revisions. Even worse, a policy can sit for years without a thorough and vetted review and, after so much time passes, the information and content is so outdated it's impossible to make a few quick updates. It becomes (painfully) easier to toss out all that work that was already done and start from scratch once again. Often a daunting and overwhelming project, this key part of employee management easily becomes low priority. When a major loss occurs, some of the first documents requested for the accident investigation will include the employer's current policies pertaining to the loss. As new employees enter the organization, they should be looking to the current policies and procedures as guidance on how to successfully perform work in a productive and safe manner. Many IL-OSHA compliance programs are required to be reviewed on a recurring cycle with certain elements within a program needing review for successful execution. So how can this all be managed? IRMA recommends a few key ways to help keep up on the maintenance of policies.

First, designate a committee that will be responsible for review of certain policies and programs. A great place to put a safety policies review is in the employer's Executive and Departmental Safety Committee(s). Make a standing agenda item that allows time and space to review, discuss, and approve needed changes. Consider the success of the administration of the policy, analyze losses that occurred and whether the current policy affected the outcome.

Second, spread policy review throughout the year. Create a calendar that outlines which policies will be reviewed during certain times of the year and by whom. Even better, plan policy review around a scheduled training topic related to that policy. For example, plan to review the fixed and portable ladder policies before a slips/trips/falls training to refresh the information and ensure employees are receiving the most updated and accurate information. Go over the policy again after the training to see if any changes need to be made.

Finally, recruit subject matter experts to review policy content. If there is an employee that stays up to date on employment law, request their review of hiring policies. Invite the employee that routinely utilizes the lockout/tagout program to assist with the required annual audit of the program. Invaluable feedback can be gained by understanding the effectiveness of a policy from both the front line and supervisory staff perspective.

Attached is a list of points to consider when doing policy maintenance.

When reviewing policies and programs, ask:

- Which programs are in place that need reviewed?
- Who manages these programs?
- How often do they need reviewed?
- What portions of the program need to be reviewed in addition to the written policy?
- Who is responsible for reviewing a program for accuracy and applicability?
- Is cross-coordination required to review with another operating department?

Plan to update policies and programs when:

- Any type of equipment, materials, or tools, or PPE changes for a work task
- A process changes for performing a task
- The current policy does not include all compliance based elements
- A new law or change to the compliance standard needs to be updated
- The current policy does not protect workers adequately
- The currently policy does not transfer risk adequately

*\*Avoid pulling policies from internet searches; review the applicable standards to ensure information is current. \**

When updating an existing policy or introducing a new workplace practice, ask:

- What other policies will be affected that also need to be updated?
- Which JSA's need to be updated?
- Which employees will be affected?
- Which employees will need general or technical training?
- How will the information get disseminated?
- Does the proposed update comply with the governing standards or mandates?
- Has the proposed update been reviewed by a competent person or subject matter expert?
- Will the updated policy require legal review?

Resources:

- *Training Requirements for OSHA Standards* - located on the Federal OSHA website
- IRMA Model Policies
- IRMA Loss Control Visit Reports
- IRMA's Member Forum
- IRMA's Risk Management Team