Voluntary Protection Programs (VPP) for the Metal Finisher

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Introduction

The Occupational Safety and Health Administration (OSHA) has been/is very successful with its employers cooperative programs. OSHA does not need to use enforcement resources for employers who actively work to create safer and healthier workplaces. Currently OSHA's cooperative programs include the OSHA Strategic Partnership Program, the Alliance Program, and the State Consultation Program. Current OSHA programs that recognize safety and health excellence are the Voluntary Protection Programs (VPP) and the Safety and Health Achievement and Recognition Program (SHARP).

Voluntary Protection Programs (VPP) in particular have attracted a diversified group of employers, from small mom-and-pop operations to large industrial sites. OSHA has worked hard to develop a "roadmap" to ease the challenge of attaining VPP status. This article outlines the benefits of the VPP program and discusses specific safety concepts needed to start/develop a successful program.

Voluntary Protection Programs: All about VPP

VPP - What's that?

OSHA (Occupational Safety and Health Act) established the Voluntary Protection Programs (VPP) in 1982 to identify and recognize worksites with outstanding safety and health programs. The VPP program sets and then measures performance-based safety and health criteria at a jobsite. Managing the safety criteria by definition falls to the site's/workplace's greater safety

team (which consists of Management, Labor and OSHA). The keystone components of VPP are the requirements for management commitment, employee involvement, hazard recognition and mitigation, as well as annual employee training.¹

So, what's all the fuss about VPP? First, worksites that achieve VPP status are removed from OSHA's programmed inspection lists. This means no more non-VPP OSHA inspections. Second, VPP OSHA only does an intensive audit (for us its four to five days long) once every three years. Third, the audit team does not issue citations to workplaces for standards violations provided that the violations are promptly corrected. This is why it is so important that only the worksites that are deserving of being included in VPP become or stay members.

How does VPP work?

VPP/OSHA uses all of its industry based safety and health requirements to establish performance-based criteria for the worksites. After receiving a site's application, OSHA will determine if a site is really to become VPP by conducting a thorough onsite assessment using a team of OSHA safety and health experts.

Acceptance into VPP is a big deal. OSHA's official "stamp of approval" / acknowledgment is only given to sites that have become the "best of the

best." VPP rewards the outstanding efforts by the company's managers and employees who, by working together, have achieved a superb occupational safety and health program. If you want to achieve VPP status, the minimum safety requirements won't do. The VPP battle cry is "Over and Above" OSHA requirements.

The benefits of becoming VPP can be nothing short of remarkable and the statistical evidence backs this up. For example, the average VPP worksite has a Days Away Restricted or Transferred (DART) case rate that is 50% below the average for its industry. Improvement takes some time and VPP sites typically do not start out with such low rates. Reductions in injuries and illnesses are a "work in-process." Management leadership and employee involvement function together to move safety from the everyday background to the forefront as a company organizational value. A company-wide dedication to safety permits the building of a culture that values healthy and safe employees.

What are the VPP benefits for employers and employees?

Fewer injuries and illnesses mean a better bottom line as workers' compensation premiums and other costs go down. In our case, the entire industry could benefit as VPP sites evolve into examples of safety excellence. I know General Magnaplate Corporation take's pride in the recognition we receive as a community leader in worker safety.

By definition, a VPP company's safety committee is made-up of 80% employees and 20% management. This gives employees a voice/empowerment in the safety and health programs. At

General Magnaplate, the safety meetings often discuss employee concerns about conditions in their working environment that may not have much to do with safety. Whenever we can, we include these items on the "to do list." Fixing/improving these items improves morale and shows management's commitment to the program, but can put a larger burden on the maintenance department.

Is VPP a benefit to OSHA?

OSHA gains passionate employers and employees spreading the message of the benefits of cooperative safety in the workplace. We VPP partners also provide OSHA with useful feedback and reduce demand on its limited resources.

The Voluntary Protection Program Participants' Association (VPPPA), a safety and health advocacy group for members of VPP started in 1985, is another benefit to OSHA. A passionate VPPPA (the physical manifestation of people's belief in the value of VPP) works closely with OSHA to develop, implement and strengthen cooperative programs. The VPPPA also provides valuable stakeholder feedback to OSHA and Congress on agency rulemaking, policies and pending legislative bills on safety and health issues.

VPP has some unique innovations

The Special Government Employees Program (SGE). The SGE is where qualified volunteers employed at VPP sites can work beside OSHA employees as team members on VPP onsite evaluations. The program began in 1994 to help leverage OSHA's limited resources but has grown in the past ten years to provide great benefits to both industry and government.

The VPPPA Mentoring Program. "The award-winning VPPPA Mentoring Program is a formal process to assist companies/facilities interested in the VPP or improving their safety and health management systems. The program matches interested sites with current VPP Star sites to help them achieve VPP recognition.

"The association utilizes a network of regional coordinators and agency officials in establishing a mentoring relationship. Depending on preferences indicated on the VPPPA Mentoring Application Form, coordinators consider similar experiences, industries, geographic location and union representation when choosing prospective mentors. Once a match has been made, the sites form a unique relationship based on the needs of the mentored site and the time and resources available to the mentor.

"The VPPPA Mentoring Program is a free resource provided by the association to sites regardless of membership status."²

Process for becoming an OSHA VPP STAR site

Getting Started. Use OSHA CSP 03-01-003 (VPP Policies and Procedures Manual, April 18, 2008 Version) as a handbook to Voluntary Protection Programs. It is available online at: http://www.osha.gov/OshDoc/Directive-pdf/CSP-03-01-003.pdf. The purpose of the manual is to provide specific guidance concerning implementation of the Voluntary Protection Programs (VPP). It includes policies and procedures that every site needs to implement to become part of the VPP family.

VPP Kick-off - Management involvement and employee participation. You know your company's culture and the best way to kick-off the VPP program at your site. It's very important to not to come across as the latest "flavor of the month." Safety is only made "real" if management and employee alike believe and are willing to be involved and actively participate in the company's program.

Perform a GAP analysis (Resources available). OSHA offers a "Do It Yourself" Evaluation Checklist in the VPP information kit on its website (http://www.osha.gov/Publications/VPP/vpp_kit.html). It's a good idea to have other interested people in the company help the safety manager perform the Self-Assessment / Gap Analyses.

Don't miss out on a great opportunity for growth in your organization by simply assigning the Gap Analysis to your Safety Manager. Use the checklist to see if your program meets VPP criteria. The corrections needed should be made before you start the application process.

Other resources available include other VPP sites, Special Government Employees (SGEs) and VPPPA mentors. We can also use private consultants and your insurance company's industrial hygienist.

Key to VPP success - Meaningful employee participation

The employees need to be involved with the health and safety program in at least three meaningful ways. This is a VPP requirement. Employees can make an impact in areas such as hazard / environmental assessment, monthly safety inspections, safety and health training and auditing of the safety and health management system.

Safety Team employees can:

- Report safety issues and work on solutions / root cause analysis.
- 2. Volunteer for the organization's Safety Team.
- 3. Conduct housekeeping and safety tours in their areas.
- 4. Participate in safety investigations and near-miss reports.
- 5. Write and review Job Safety Analysis for workstations.
- 6. Develop/Participate in employee improvement suggestion program.
- 7. Help to train others in safety and health.
- 8. Be a role model for others.

Every Employee should be trained to see and react to the simple stuff like blocked fire doors / exits and review the condition of fire extinguishers and eyewash stations. Employees should be able to properly identify, use and store the proper PPE for each detailed job processes. The important thing to remember is that the more eyes you have identifying and fixing hazards makes each work process safer.

Does VPP really work?

At site after site, the evidence of VPP's success is impressive. Recent data shows that injuries and illnesses are dramatically below industry averages. As a result, VPP companies / worksites are estimated to have saved more than a billion dollars since the program's inception in 1982. Many VPP companies report workplace improvements such as higher productivity, lower employee turnover and absenteeism rates, as well as improved employee morale.

The fundamental premise of VPP is to encourage the greater safety team to all be proactive in preventing and controlling occupational injuries, illnesses and work place hazards. Voluntary Protection Programs can work for everyone.

References

- 1. "All About VPP" Occupational Safety & Health Administration Website, http://www.osha.gov/dcsp/vpp/all_about_vpp.html; Last accessed 09/01/10.
- 2. VPPPA website, http://www.vpppa.org/ Mentoring/; Last accessed 09/01/10.



About the author

Fred Mueller, CEF is the Corporate Quality and Safety Manager for General Magnaplate in Linden, NJ. He is a longtime member of the Philadelphia Branch, who has gone through the "chairs" at both the local and national levels, including a successful term as AESF National President. Fred is currently a trustee on the AESF Foundation and is serving as the Chairman of the Education Committee. Fred has authored several SUR/FIN papers on soak cleaner and quality issues and has written for several of the surface finishing magazines.

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