

RTICIPATION Multielement Approach

By Joe Story and Jason Kight

ACCORDING TO BEST PRACTICE RECOMMENDATIONS from

OSHA (2016b), employers are encouraged to involve workers in safety and health efforts. Commonly used consensus standards such as ANSI/ASSP Z10 and OHSAS 18001, as well as the newly issued ISO 45001 also emphasize the importance of worker participation (ISO, 2018; Raines, 2011). CSB (2018) has also recognized the importance of worker involvement and introduced plans to begin involving workers in future incident investigations.

Both workers and organizations can benefit from employee participation. Workers can often identify hazards missed by management and can provide perspectives that frequently result in more effective leading indicators and control strategies. Further, involving the workforce in safety management can improve safety performance and morale, and increase employee acceptance of changes in workplace policies (OSHA, 2012; Raines, 2011; Sarkus, 1997).

This article discusses the worker participation requirements found in OSHA and consensus standards, and proposes a framework to increase workforce participation and collaboration with management. Additional best practice recommendations to maintain worker engagement and motivation are also discussed.

Summary of Participation Requirements

From a safety and health management standpoint, worker participation is considered by many to be more of a best practice than a strict regulatory requirement. However, there are many instances where OSHA requires worker involvement. In some cases, the participation requirements are passive and do not require collaboration between management and workers.

KEY TAKEAWAYS

- Best practice recommendations from OSHA and numerous consensus standards advise employers to include workers in safety and health efforts.
- Many organizations fail to take a comprehensive approach to worker participation and are unable to reap the full benefits of employee involvement.
- Worker participation can increase if numerous participation opportunities are made available to employees.
- This article summarizes various participation requirements and offers suggestions for creating a more comprehensive workforce participation program.

Incident reporting requirements, providing workers with access to information and requiring workers to attend safety training are examples of passive worker participation requirements (OSHA, 2015b; 2016b; 2017). However, in other instances, participation requirements take a more active approach and require management and workers to collaborate. The new confined spaces standard for construction, the process safety management (PSM) standard and the requirement by 14 states for employers to establish safety committees are examples of instances where workforce participation is active and collaboration is required (OSHA, 2000; 2015a; 2016c).

Numerous consensus standards also require worker participation. OSHA's Voluntary Protection Programs (VPP) require employees to "be involved in the safety and health management system in at least three meaningful, constructive ways" (OSHA, 2008, p. 23). The directive also encourages organizations to involve employees in decision-making processes and specifically mentions worker inclusion in program audits, incident investigations, program implementation and work site analysis.

According to ANSI/ASSP Z10 (2017), employers are required to ensure that everyone in an organization participates in the safety and health program. Guidelines from International Labor Organization (ILO, 2001) state that employers must provide workers with the time and resources to actively participate in the "organizing, planning and implementation, evaluation and action for improvement of the OSH management system." OHSAS 18001 (replaced by ISO 45001) requires organizations to include workers in the review of safety policies and be involved in changes to the policies (Raines, 2011). The newly developed ISO 45001 continues the requirement for worker involvement in safety (ISO, 2018).

In summary, OSHA's PSM and construction confined spaces standards both require a more collaborative approach to worker involvement. Similarly, many consensus standards require collaboration between workers and managers. Table 1 (p. 22) summarizes the collaborative participation requirements for the PSM and construction confined spaces standards, as well as for the consensus standards noted.

Perspectives & Guidance on Worker Participation

There are many ways to conceptualize worker participation. OSHA (2016b) defines workforce participation as the process of involving workers in the establishment, operation, evaluation

TABLE 1 SUMMARY OF STANDARDS REQUIRING COLLABORATIVE PARTICIPATION

Standard	Reference	Summary of requirement(s)	
OSHA Process	29 CFR	"Employers shall consult with employees and their	
Safety	1910.119(c)(2)	representatives on the conduct and development of process	
Management		hazards analyses and on the development of the other	
		elements of process safety management in this standard."	
OSHA	29 CFR	"Employers must consult with workers or their authorized	
Construction	1926.1212(a)	representatives on the development and implementation of all	
Confined Spaces		aspects of the permit space program."	
OSHA VPP	Chapter 3	Workers must be involved in at least three meaningful and	
		constructive ways.	
ANSI/ASSP Z10-	Section 3.2	All workers in an organization must participate in the safety	
2012(R2017)		program.	
ILO-OSH-2001	Section 3.2	Workers must be involved in the organization, planning,	
		implementation and evaluation of safety programs.	
ISO 45001-2018	Section 5.4	Workers must be given the time, resources and information	
		needed to participate in the safety program and must be	
		involved in program management. Participation barriers must	
		be addressed.	

Note. OHSAS 18001 is not included because it was replaced by ISO 45001.

TABLE 2 CHARACTERISTICS OF EFFECTIVE & INEFFECTIVE WORKER PARTICIPATION

Effective program	Ineffective program
The safety program is developed and managed by a team that includes workers. Workers are recognized for their contributions.	The safety program is developed and managed without the input of workers.
Workers are given the time and resources needed to participate.	Management considers giving time and resources to workers for safety program participation to be wasteful.
Workers know reporting procedures and are comfortable reporting concerns to management. Management gets information directly from	Reporting requirements are unclear and workers are hesitant to give information to management. Management relies on supervisors for information.
workers.	
Management promptly acknowledges receiving a concern and addresses issues quickly.	Management does not acknowledge receiving reports and does not follow up.
Management allows workers to help find solutions to safety issues and ensures that suggestions are presented to the workforce for additional input.	Workers are not involved in finding solutions to problems and are informed of new controls after management has implemented them.
Workers can access all the information they need to actively participate in the safety program. Management freely provides information.	Workers can only see the minimum information. Workers must labor to obtain information.
Concerted efforts are made to ensure that program materials reflect workforce diversity and that workers easily understanding things.	No attempts are made to ensure that the materials for the safety program are understandable.
Workers have stop-work authority and are empowered to use it without fear of retaliation.	Stop-work authority does not exist, or exists as an abstract, theoretical concept only.

Note. Adapted from "Safety and Health Program Self-Evaluation Tool for General Industry," by OSHA, 2017.

SUMMARY OF WORKER PARTICIPATION ELEMENTS

Element	Concept	Examples	Pros	Cons
Information	Allow workers to voice concerns; provide workers with information upon request.	Comment boxes; information availability.	Simple to implement; signals management is receptive to worker input.	Not interactive or engaging. Workers may not take advantage of informational elements if other participation opportunities are absent.
Procedure	Require worker participation in certain aspects of the safety program.	Require workers to report incidents, adhere to standard operating procedures, complete job safety analyses, and attend safety training.	High percentage of workforce will participate; good documentation will reduce legal liabilities; data will be generated for later audits and analyses.	Processes are not engaging and workers may go through the motions to avoid discipline. Data generated not always reliable due to "pencil whipping."
Creative	Allow workers with artistic talents to create materials for the safety program.	Employee-generated media (e.g., posters, slogans, training materials).	Artistic endeavors are intrinsically motivating and engaging. Workers are also receptive to things created by coworkers.	Will not appeal to everyone. Caution must also be taken to avoid problems (e.g., taking pictures in production areas).
Integration	Integrate workers into the safety program management.	Involving workers in safety program and culture audits.	Highly engaging; provides meaningful and useful worker contributions to safety; can help with employee relations.	Can be time consuming and cumbersome to develop ways for all workers to participate. In unionized workplaces conflicts can occur.
Collaboration	Involve workers in decision-making via collaboration between workers and management.	Creating safety committees and having workers help develop safety performance metrics.	Highly engaging and allows workers to take ownership of the safety program.	Can cause conflict if workers do not get their wishes. Potential conflict in unionized workplaces.
Participation maintenance	Ensure that worker participation is maintained.	Maintaining management commitment, removing participation barriers and conflicts of interest.	N/A	N/A

and improvement of a safety program. This definition implies that worker participation should be active rather than passive. OSHA has identified five action items to help employers get workers more actively involved in safety programs. These action items encourage employers to create a culture in which workers can freely report concerns to management, obtain the necessary information to participate in the safety program and be involved in program management tasks. They also encourage employers to remove barriers that might hinder or discourage worker participation. Following are the five action items to encourage worker participation and OSHA's suggestions for accomplishing each (OSHA, 2016b).

- 1) Encourage worker participation:
- •Provide workers the necessary time and resources to participate.
- •Give positive reinforcement to workers who participate.
- •Have an open-door policy and encourage workers to discuss problems.
 - 2) Encourage workers to report concerns:
- •Create a reporting system for workers to report incidents or concerns (include a way to anonymously report concerns).
- •Emphasize that management will not retaliate or use the information against workers in any manner.
- •Promptly follow up on worker concerns and involve workers in problem-solving processes.

Successful participation strategies offer a variety of ways for workers to participate. This is because participation and engagement will fluctuate depending on the opportunities made available to workers.

FIGURE 1 WORKER PARTICIPATION **EVALUATION**

Element	Components
Information	☐ Workers have access to information
	about workplace hazards and what is
	being done to control them.
Procedure	☐ Time and resources are set aside for
	worker participation.
	☐ An open door is maintained and workers are encouraged to discuss their concerns with management.
	☐ Provisions exist for workers to report
	injuries and concerns.
	☐ Workers are assured that managerial
	retaliation will not occur.
	☐ Worker concerns are addressed as soon
	as feasibly possible.
	☐ Workers are regularly reminded that they
	can use stop-work authority without
	repercussions.
Creative	☐ Workers are encouraged to create media
	for the safety program.
	☐ Safety program campaign media (e.g.,
	lessons learned posters, slogans) have
	been created with the assistance of
	workers.
Integration	☐ Workers are allowed to inspect job
	hazard analyses and routine inspection
	results.
	☐ Workers assist with hazard identification,
	control selection, and the development of
	safe work practices and procedures.
	investigations, safety training, program audits and exposure monitoring.
Collaboration	☐ Workers help create safety goals and
	performance metrics.
	☐ A safety committee has been established.
Maintenance	☐ Safety program content and safety
	training reflects the education level and
	languages found in the workforce.
	☐ Compensation programs are not tied to
	safety performance.

Note. Adapted from "Safety and Health Program Self-Evaluation Tool for General Industry," by OSHA, OSHA, 2017; and "Recommended Practices for Safety and Health Programs" (Publication No. OSHA 3885), by OSHA, 2016.

- •Give workers stop-work authority.
- 3) Provide workers with information:
- •Give workers information about workplace hazards and what is being done to control hazards.
- •Allow workers to inspect job hazard analyses and routine inspection results.
 - 4) Involve workers in safety programs:
 - •Involve workers in goal setting.
 - •Allow workers to help identify hazards and develop controls.
- •Allow workers to help develop safe work practices and procedures.
- •Involve workers in incident investigations, safety training, program audits and exposure monitoring.
 - 5) Remove participation barriers:
 - •Ensure that workers feel their input is valued.
- •Ensure that education or language does not create an impediment to participation.
- •Ensure that incident reporting does not jeopardize incentives, bonuses or other compensation.

The action items are intended to foster comprehensive worker participation. Participation recommendations in the action items range from giving workers information to involving them in decision-making processes. The first three action items focus on passive participation and the fourth action item begins the process of integrating workers into safety management and decision-making processes. The entire notion of the fourth action item is to facilitate active participation through interactions between management

The big takeaway of these action items is that an effective approach involves many strategies. An effective participation model will provide many opportunities for involvement and is cautious about alienating workers. Conversely, ineffective programs offer limited means of participation or are set up in a manner that unintentionally restricts or voids some workers from participating. Table 2 (p. 22) describes characteristics of effective and ineffective worker participation models.

Although not listed on the participation page, OSHA has identified artistic work as an activity that can motivate workers to participate in workplace safety. The 2017 Safe + Sound Week campaign encouraged employers to have workers use their creative talents to find and fix hazards, as well as show their commitment to safety. OSHA recommended using games, fashion shows, scavenger hunts and skits to get workers thinking about safety (OSHA, 2017b).

Elements of a Comprehensive Worker Participation Program

Successful participation strategies offer a variety of ways for workers to participate. This is because participation and engagement will fluctuate depending on the opportunities made available to workers. In addition, excluding certain means of participation may signal questionable commitment from management concerning the involvement of workers in the safety program.

OSHA's participation suggestions can be aggregated into six broad elements differentiated by the amount of active involvement they provide to workers. A comprehensive worker participation program will include information, procedure, creative, integration, collaboration and participation maintenance elements (Table 3, p. 23).

Information Elements

Information elements allow workers to express concerns and obtain information without resistance. Common examples of information elements are suggestion boxes, feedback surveys or making information [e.g., policies, safety data sheets (SDS)] available to workers upon request. Some elements (e.g., providing SDS upon request) are required by OSHA and consensus standards. With information elements, communication generally flows in one direction (i.e., from workers to managers or from managers to workers), meaning that they are not interactive or engaging and may not generate much worker involvement (Emery & Savely, 1997).

Procedure Elements

Procedure elements essentially mandate that workers participate in some manner. Examples include requirements to attend safety training, adhere to standard operating procedures or to complete a job safety analysis before starting work. Giving workers stop-work authority and requiring workers to report incidents are also examples of procedure elements. Mandatory participation through procedure elements results in high worker participation, but the participation is typically passive and unengaging. Procedure elements can also generate large volumes of data for the safety program. However, if workers do not understand the importance of the procedures and "pencil whip" the forms, the data they submit may not be reliable (Ludwig, 2014).

Creative Elements

Creative elements enable workers to use their creative and artistic talents to generate materials for the safety program. Common examples of creative elements are safety slogan contests or the creation of lessons learned posters. Creative work can be engaging because it is enjoyable and workers can gain recognition for their artistic talents (Williams, 2008). However, not all workers have such talents or are motivated by intellectual endeavors. Take caution to ensure that participation does not violate company policies, create unsafe conditions or cause disruptions (e.g., taking photos of production areas).

Integration Elements

Integration elements strategically integrate the workforce into program management processes. For example, workers can assist with jobsite inspections, control selection and incident investigations. Employees can also act as subject matter experts for safety training materials and help deliver training to coworkers. Integration takes advantage of worker perspectives and can provide workers with a sense of program ownership. However, developing ways to integrate large numbers of workers into the safety management process can be cumbersome and difficult in some organizations.

Collaboration Elements

With collaboration elements, workers and managers actively collaborate with each other toward the shared goal of increased workplace safety. Collaboration is unique in that it allows workers to take ownership of the safety program. It also allows multiple perspectives to be applied to a problem and can improve decision-making processes. Involving workers in safety culture audits, safety program audits, safety goal-making and safety committees are examples of collaboration elements.

Participation Maintenance Elements

Participation maintenance elements are intended to ensure that worker participation accomplishes its overall goal of improving safety and does not erode over time. Regardless of how workers participate, it should be clear to everyone in the organization that safety is a team effort and that management is sincere, values worker input and is committed to involving the workforce in the safety program. Additionally, participation barriers and conflicts of interest that might discourage information flow (e.g., bonuses, incentives) should be identified and removed.

Noted that integration and collaboration elements are distinctly different; integration focuses on involving workers in key program management aspects whereas collaboration focuses on involving workers in important decision-making processes.

A comprehensive safety program should include all six worker participation elements with particular attention to integration and collaboration elements. These elements are engaging and enhance the safety program by taking advantage of worker expertise and perspectives. These elements also clearly show

FIGURE 2

WORKER PERCEPTIONS SURVEY

Ask workers to indicate their level of agreement (strongly agree, agree, slightly agree, slightly disagree, disagree or strongly disagree) with the following statements.

- 1) I am provided opportunities to participate in the safety program.
- 2) I am encouraged to participate in the safety program.
- 3) Management sets aside time for safety participation and does not rush workers.
- 4) I am comfortable taking safety and health issues to management.
- 5) I know how to report incidents, injuries, hazards and safety concerns to management.
- 6) Management will not retaliate against me if I report an incident or voice a safety concern.
- 7) Management is concerned about safety and promptly addresses all safety concerns.
- 8) I have access to the information I need to work safely.
- 9) Management seeks my input before implementing a new safety control or developing safety new training content.
- 10) Management is approachable and has an open door.
- 11) When industrial hygiene monitoring occurs, I understand what is being done and why (if applicable).
- 12) When I am given forms or receive safety training, I can understand the content.
- 13) I have stop-work authority and can use it with no fear of punishment.

Note. Adapted from "Safety and Health Program Self-Evaluation Tool for General Industry," by OSHA, 2017; and "Recommended Practices for Safety and Health Programs" (Publication No. OSHA 3885), by OSHA, 2016.

that management is serious about worker involvement and is committed to involving workers in safety and health efforts.

Importance of a Multielement Approach

Many workers want to have their concerns heard and would like to play an active role in identifying and solving workplace problems. A multielement approach helps an organization meet regulatory obligations while also providing workers with many opportunities to participate, whether through an anonymous suggestion or being actively involved in a safety

Additionally, a multielement approach addresses the one-size-fits-all approach used by many organizations. This approach is problematic because the lack of participation opportunities alienates some workers. Offering more opportunities could motivate them to participate. For example, an employee may not feel comfortable participating in workplace inspections but would welcome an opportunity to help create and deliver training materials. Increasing the participation options allows more workers to participate and can increase information flow about hazards.

Finally, providing multiple participation opportunities can help management demonstrate the strength of the organization's safety culture and management's commitment to safety. Many workers may view the participation opportunities presented to them as a barometer that indicates the management's sincerity about workplace safety and about involving them in the safety program.

Additional Participation Enhancement & Maintenance Considerations

Many organizations can successfully get workers to participate in safety programs, but participation may fall off after a short period. This is of particular concern because once workers lose interest, it can be difficult to regain their trust and convince them to participate again.

Worker participation may be lost if management fails to address worker concerns, recognize worker contributions, maintain accessibility, maintain equality, keep participation elements separate, rotate workers or control team numbers. Additionally, failure to regularly audit participation or measure worker perceptions toward it may allow hidden problems to slowly erode worker participation.

Failure to Address Worker Concerns

Failure to provide workers with consistent, timely feedback can cause their confidence in management to diminish and reduce their desire to continue participating. Additionally, if management addresses some concerns but not others, workers may feel that management is selectively addressing concerns.

TABLE 4 **SUMMARY OF OSHA RECOMMENDATIONS** FOR TEMPORARY WORKER PARTICIPATION

Action item	Summary of OSHA suggestions		
Establish	Host organizations		
effective	•Communicate with contractors or staffing agencies and decide responsibilities for		
communication	each organization.		
	•Create a way to inform staffing agencies and contractors of workplace hazards and controls, nonroutine tasks and emergency procedures.		
	•Allow representatives from staffing agencies or contractors to visit work sites and conduct walk-around inspections, and inspect injury and illness records or other safety program information.		
	Staffing organizations and contractors		
	•Inform host employers of reports of illness and injury, worker concerns or hazards. •Share safety policies and procedures with host organizations.		
Establish	Host organizations		
effective	•Indicate safety performance requirements, and ensure that staffing agencies or		
coordination	contractors meet requirements before work starts.		
	•Identify potential concerns (e.g., where and how workers will report issues) and develop procedures to resolve conflicts.		
	•Compare safety programs and resolve conflicting policies or procedures.		
	•Coordinate with temporary agencies and contractors so that work scheduling does not impact safety.		
	•Ensure that individuals doing the work have the proper equipment and have received proper training.		

Note. Adapted from "Communication and Coordination for Host Employers, Contractors and Staffing Agencies," by OSHA, 2016.

Failure to Recognize Worker Contributions

Workers are often proud of their ideas and contributions, and should receive appropriate acknowledgment. Failure to give proper recognition can send a message that management plays favorites or that not all ideas are acceptable. When this occurs, workers may withhold information and abstain from participating.

Failure to Maintain Accessibility

Members of the management team and safety personnel should regularly walk through production areas and become a familiar, approachable face to workers. Consider having workers cross-train managers to do production jobs. Having managers learn production jobs can humanize them, improve relations and give managers insight that will help them understand worker perspectives when concerns are raised.

Failure to Maintain Equality

It is important to ensure that no worker feels inferior to another worker. Supervisors, managers and seasoned employees should not be allowed to drown out the concerns of workers. Everyone should have equal say and no worker should be given a louder voice or be allowed to diminish the concerns of another worker.

Failure to Keep Elements Separated

It is also important to not confuse elements. For example, when including employees in audits, give them an active role in the process if integration is the goal. Simply having workers complete surveys does not constitute integrating them into an audit. This is a procedure element that is improperly labeled as workforce integration. Integration would be having employees help develop surveys, analyze the results and develop action plans to correct identified deficiencies.

PARTICIPATION ELEMENTS IN ACTION

Element	How utilized	
Information	Workers were given information about workplace hazards and the control options that were being considered.	
Procedure	Workers wore their PPE during the trials.	
Creative	Workers developed PPE training content and PPE reminders for their work areas.	
Integration	Workers helped decide which PPE would be purchased and were allowed to design and deliver PPE training.	
Collaboration	Workers were allowed to provide input on which controls would be best and were included in the decision to use PPE.	

Failure to Control Team Numbers

Avoid having large numbers of individuals assigned any one task; while it may be well intentioned, it can lead to issues. For example, if a large number of people on a safety committee make it impossible for an individual to have a voice, that person's desire to continue participating may decrease. Increasing the number of members also increases team maintenance requirements. In some cases, teams become so large that team maintenance requirements negate their ability to accomplish anything constructive. There is no universal, one-size-fits-all number to have on a work team. However, citing maintenance demands, Richard Hackman, an expert on work teams, recommends that a team contain no more than 10 members (Coutu, 2015). Teams with more than 10 members tend to get little accomplished since much of the time and energy is focused on team maintenance rather than accomplishing tasks.

Failure to Regularly Audit Participation

Worker participation should be included as part of a regular, comprehensive safety program audit. Failure to regularly review the effectiveness of participation elements can allow hidden problems to slowly erode worker motivation. Figure 1 (p. 24) can be used to assess whether or not the safety program effectively contains all six participation elements. Additionally, Figure 2 (p. 25), although not scientific or validated, can provide a snapshot of how workers feel about the state of worker participation in the safety program, as well as identify areas for improvement.

Participation of Temporary Workers

Many organizations utilize temporary and contract workers. With these types of arrangements, all parties must communicate and coordinate with each other to ensure that a safe work environment is created and maintained.

Host employers should ensure that staffing agencies, contractors and temporary workers all know safety policies and procedures, have access to information relevant to workplace safety, and are informed of the workplace hazards and controls. It is important that both parties exchange information before work starts and as needed thereafter if conditions change or if updates are warranted.

A host organization can take several steps to successfully involve temporary workers in a safety and health program and include them in participation efforts: Treat temporary workers like regular workers, integrate staffing agencies and contractors into the safety program, address worker concerns and potential confusions, and conduct safety culture assessments on staffing agencies or contractors before work begins. Table 4 summarizes OSHA recommendations for involving temporary workers in safety programs.

Treat Temporary Workers Like Regular Workers

Regular workers and temporary workers are exposed to the same hazards and should be given the same participation opportunities, provided doing so does not place trade secrets or other forms of intellectual property at risk. Additionally, provide temporary workers with the same recognition for their participation and contributions.

Integrate Staffing Organizations & Contractors Into the Safety Program

Integrate staffing agencies, contractors and their workers into the safety program as much as possible. Allow them to participate in safety activities such as walk-around inspections and collaborate toward safety solutions.

Address Possible Worker Concerns & Eliminate Confusion

In some instances, temporary workers may be confused about who actually employs them. This could lead to confusion over where and how incidents and safety concerns are to be reported. Organizations should be in agreement with staffing agencies concerning where temporary workers are to report injuries and concerns. Temporary workers should also know that no one will retaliate or terminate them for reporting an incident or safety concern, even if the report inadvertently goes to the wrong person.

Evaluate the Safety Culture of Prospective Staffing Organizations & Contractors

A safety culture assessment of the staffing agency may be a necessary part of ensuring temporary worker participation. A staffing agency or contractor with a poor safety culture may send signals to their workers that discourage them from participating in safety.

Example of Participation Elements in Action

This article concludes with an example of worker participation elements in action. In this fictitious scenario, all participation elements (excluding maintenance elements) will be utilized to solve a hazard control selection problem. Consider a situation in which a hazard control decision must be made and PPE is being considered.

Begin by consulting with affected workers and asking their opinion of the various control options being considered. Ask the workers for their suggestions and input. Explain the hierarchy of controls to them and see if they can come up with solutions other than PPE. If management and workers come to a consensus that PPE is the best option, have workers research various brands and models, conduct trials and develop recommendations. After final decisions are made, allow workers to create PPE training materials, conduct PPE training and develop signs for work areas to remind workers to wear PPE. Table 5 (p. 27) provides a breakdown of how each participation element played a role in this scenario.

Conclusion

Many safety articles discuss the importance of worker participation. High worker participation in safety and health efforts improves morale, lowers absenteeism and increases productivity while reducing injury risks (OSHA, 2012). Allowing the workforce to have a voice in safety issues creates a safety culture in which workers have a sense of safety program ownership. It also signals that management is committed to safety and will address worker safety concerns.

This article outlines participation requirements and presents a multielement model for comprehensive worker participation. The primary goal of this article is to illustrate that worker participation involves many components and that the maximum benefits of worker participation will only be achieved if all workers are given an opportunity to participate. **PSJ**

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