

## **Executive Safety Committees – Common Pitfalls and Implementation Considerations**

**Annamarie M. Gibbs, MA, CSP, CRIS**  
**Manager, Risk Control Services**  
**Lockton Companies, LLC**  
**Kansas City, Missouri**

**Derrick J. Hellinga**  
**Director of Health and Safety Services**  
**Tyson Foods, Inc.**  
**Springdale, Arkansas**

### **Introduction**

The idea for this discussion began with a very simple question: Should my company have an executive-level safety committee? However, finding the answer to this question was not simple. Research on the subject revealed some information on companies with executive-level safety committees, but did not provide significant insight into why the committees were formed or how a company might benefit from a formal high-level committee.

The goal of this discussion is to provide a framework that will help Environmental Health and Safety professionals and others consider if the establishment of an executive-level safety committee is a concept that should be pursued within their organization. This framework includes definition of Executive Safety Committee (ESC), highlighting its **Purpose; Roles and Responsibilities; Common Structures; ESC Appointment Considerations; Connectivity to Sustainability; Common ESC Pitfalls; and ESC Implementation Considerations.**

#### Purpose of an Executive Safety Committee

An Executive Safety Committee is structured to be the governing body presiding over safety policies, procedures, and processes that have been implemented in order to protect an organization's employees, customers, and assets. It has been well established that executive management's support and commitment to environmental health and safety initiatives directly affect the safety culture within any organization. Due to the business and cultural impacts that executive support of an organization's safety and health process can have, it is critical to consider whether the amount of oversight and direction at various executive levels of an organization are appropriate.

Several organizations have increased their level of oversight of safety and health processes by appointing Executive Safety Committees, which are made up of several, if not all, executive management members. Additionally, larger corporations, such as Weyerhaeuser Corporation,

Potash Corporation, BHP Billiton, GlaxoSmithKline, and VF Corporation, have linked and even included safety and health oversight responsibilities with corporate governance committees.

### Roles and Responsibilities of an Executive Safety Committee

Organizations implement ESCs at a high level to ensure that safety and health consideration are a part of the company's overall strategic business plan. The following are examples of typical functions performed by an ESC:

1. Develop and communicate a clear vision for the environmental health and safety programs to the organization's officers, managers, employees, and others.
2. Establish broad safety goals for the organization.
3. Evaluate an organization's progress toward meeting those goals with objective measurement tools.
4. Provide a forum for the various employees, teams, business units, or other groups to bring forward their concerns and resolve issues internally, within the framework and without needing external regulatory intervention.
5. Ensure mechanisms are in place for systematic identification and mitigation of risk.
6. Review reports prepared by management with respect to any extraordinary event or condition involving significant risk to public health or safety, major public controversy, significant environmental damage, material liability, or the potential thereof.
7. Identify and recommend health and safety priority areas for the purpose of rational resource allocation.

### Common Structures of Executive Safety Committees

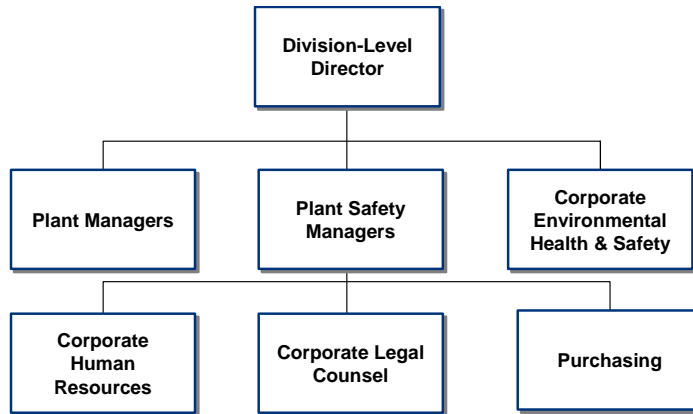
The Executive Safety Committee structures that were identified through research include committees at the division level, executive level, and governance level. While the overall mission of each of the committees is similar, the sphere of influence of the division level is limited with respect to the entire corporation.

Research indicates that implementing an ESC is common for postsecondary universities such as Princeton, Purdue, Harvard, and Cornell. In the case of a postsecondary institution, an ESC provides the official interface between other specific safety committees, i.e., Radiation Safety and the faculty. Any issues that the individual safety officers cannot resolve are brought before the ESC. The ESC also discusses major policy decisions or changes in direction.<sup>1</sup>

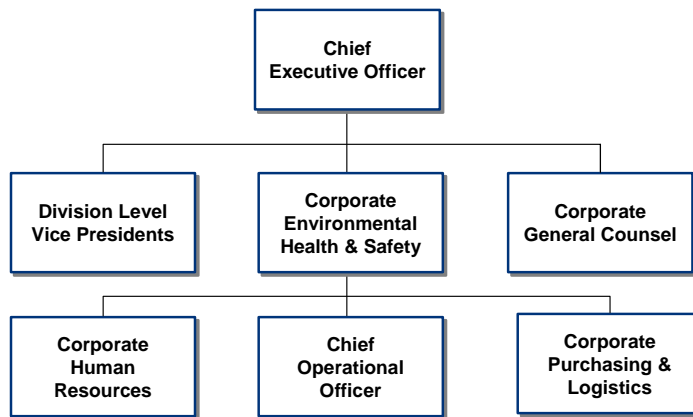
Common ESC structures are depicted in Exhibits 1 through 3.

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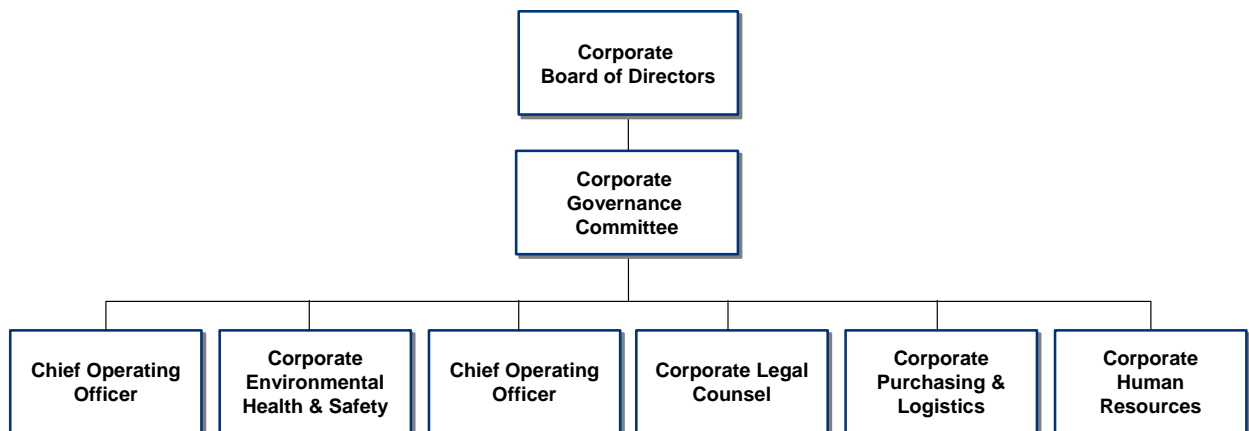
<sup>1</sup> Princeton University Environmental Safety and Risk Management Committee, "Committee Charter," <http://web.princeton.edu/sites/ehs/about/esrm.htm>.



**Exhibit 1. This is a division-level executive safety committee organizational chart.**



**Exhibit 2. This is an executive-level safety committee organizational chart.**



**Exhibit 3. This is a governance-level executive safety committee organizational chart.**

## ESC Appointment Considerations

As you are considering if your company should establish an ESC, it is important to determine who the members should be, how they will be appointed, and the responsibilities of each individual. The ESC could be a standing committee appointed by a governing body within the organization, such as The Board of Directors. The committee may be accountable to the Board of Directors for oversight responsibilities relating to the management of health, safety, and environmental programs and processes. In addition, those appointed to the committee may be responsible for reviewing and recommending to the Board of Directors for approval, a company's Health and Safety Charter and Sustainability Policy.

The individuals authority is directly linked to the level at which the ESC is established (Board level, CEO level, or Operations level). The most important aspect of the committee member appointment is the individual's authority and the business knowledge to act and represent the interests of all operations and environmental health and safety.

### Responsibility of Appointment

1. Periodically report to the Board of Directors of the corporation (or governing body within the organization) regarding environmental, health, and safety matters affecting the organization and its subsidiaries.
2. Act on matters as the Board of Directors (or governing body) may direct.
3. Review and discuss with management the status of environmental, health, and safety (EHS) issues, including compliance with applicable EHS laws and regulations, results of internal compliance reviews, and remediation projects.
4. Convey information and developments relative to new or revised standards and policies to the workforce and community.
5. At each meeting, receive progress reports on the resolution of EHS issues reported by the committee.
6. Bring together a broad base of internal expertise to troubleshoot EHS problems and devise risk control strategies.
7. Oversee the system of internal responsibility and accountability within the organization.
8. Promote health and safety and foster a credible "safety culture."
9. Identify and work toward EHS goals focused on leading and lagging indicators. (Example: leading indicators include audits and training; lagging indicators include dart rates and workers' compensation losses.)
10. Submit an annual report of its activities to the Board of Directors or governing body.

## Requirements

Are there any laws or governing bodies requiring the establishment of Executive Safety Committees?

Research of state, federal, and certifying bodies revealed that language within certain standards does imply the benefit of, but not directly state a requirement for the establishment of an ESC. For example, the state of Oregon requires a workplace safety committee for any employer with more than ten employees where management has control over a portion of the budget and management has the authority to act on safety committee recommendations. This is a site specific requirement. An executive-level committee could bring consistency to the safety process for Oregon employers with multiple locations. An ESC would be an addition to the site-specific committees but would not replace the site-specific requirements. Other examples:

### Voluntary Protection Program

Within the Occupational Safety and Health Administration (OSHA) Corporate Voluntary Protection Program (VPP) Application Template, sections 1.4—“Management Commitment” and 1.5—“Employee Involvement” reference the existence of a safety committee within the organization. Specifically, section 1.4 states, “Top management periodically participates in safety meetings and inspections.”<sup>2</sup> The existence of an executive-level safety committee may enhance the potential to obtain VPP status.

### Environmental Protection Agency

The Environmental Protection Agency (EPA) has instituted recommendations for Environmental Management Systems within agribusiness, metal casting and metal finishing, ports, shipbuilding, and ship repair industries. The Environmental Management Systems processes imply top management attends executive-level safety committees.<sup>3</sup>

### International Standards Organization

The ISO 9000 and ISO 14000 standards have been implemented by 887,770 organizations in 161 countries. ISO 9000 is an international reference for quality management requirements in business-to-business dealings and ISO 14000 was designed to assist organizations in meeting environmental challenges.<sup>4</sup>

The ISO 9000 states, “to maintain the quality system and produce conforming product, you need to provide suitable infrastructure, resources, information, equipment, measuring and monitoring devices, and environmental conditions. You need to regularly review performance through internal audits and meetings.”<sup>5</sup>

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<sup>2</sup> U.S. Department of Labor, Occupational Safety & Health Administration, “Voluntary Protection Programs Directorate of Cooperative and State Programs,” [http://www.osha.gov/dcsp/vpp/corporate/application\\_template.html](http://www.osha.gov/dcsp/vpp/corporate/application_template.html).

<sup>3</sup> U.S. Environmental Protection Agency, “Sector Programs: Environmental Management Systems,” <http://www.epa.gov/sectors/ems.html>.

<sup>4</sup> International Organization for Standardization, “ISO 9000 and ISO 14000 – in brief,” <http://www.iso.org/iso/en/iso9000-14000/understand/inbrief.html>.

<sup>5</sup> Wikipedia, “ISO 9000,” [http://en.wikipedia.org/wiki/ISO\\_9000](http://en.wikipedia.org/wiki/ISO_9000).

Some of the requirements of ISO 18000 also imply existence of an executive-level safety committee; specifically, the requirement that the safety policy be reviewed by the executive level. The 18001 standard requires that the policy be appropriate to the nature and scale of the occupational health and safety risk of the organization and includes a commitment to continuous improvement. It also contains the requirement to comply with current applicable occupational health and safety legislation and it be documented, implemented, and maintained.

### Global Reporting Initiative

The Global Reporting Initiative (GRI) “is a unique, multi-stakeholder organization founded on the conviction of consistent, regular, and comparable reporting provides transparency and can be a powerful catalyst to improve performance.” A company who is involved with the GRI can report on a wide range of topics. “Relevant topics and indicators are those that may reasonably be considered important for reflecting the organization’s economic, environmental, and social impacts or influencing the decisions of stakeholders, and, therefore, potentially merit inclusion in the report.”<sup>6</sup>

Environmental, health and safety processes and programs can directly influence an organizations economic and environmental performance. An executive-level safety committee may be considered one of the “indicators” for a company involved with the Global Reporting Initiative. Similar to the certifying bodies and standards organizations discussed, the GRI language does imply the benefit of, but not directly state a requirement for the establishment of an executive-level safety committee.

## **Connectivity to Sustainability**

As you are considering if your company should establish an ESC, it is important to think about how having an executive-level safety committee connects to your company’s sustainability programs. “Sustainability is an attempt to provide the best outcomes for the human and natural environments both now and into the indefinite future. It relates to the continuity of economic, social, institutional, and environmental aspects of human society, as well as the non-human environment. It is intended to be a means of configuring civilization and human activity so that society, its members, and its economies are able to meet their needs and express their greatest potential in the present, while preserving biodiversity and natural ecosystems, and planning and acting for the ability to maintain these ideals in the long term. Sustainability affects every level of organization, from the local neighborhood to the entire planet.”<sup>7</sup>

This definition becomes complicated when linked to an ESC; however, it becomes clearer when you consider that executive-level committees deal with the following:

- Issues, concerns, and developments related to policies that are reasonably expected to have a material impact on operations or major projects, including environmental stewardship, occupational health and safety, and social issues.

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<sup>6</sup> Global Reporting Initiative, “About GRI,” <http://www.globalreporting.org/AboutGRI>.

<sup>7</sup> Wikipedia, “Sustainability,” <http://en.wikipedia.org/wiki/Sustainability>.

- Emerging public or legal issues in the areas covered by policies, which are reasonably expected to have a material impact on business.
- Making performance decisions under, and in compliance with, applicable laws providing for the protection of the environment, employees, and the public.
- Monitoring the status of any investigations or legal proceedings of a material nature. “Information is material if its omission or misstatement could influence the economic decision of users taken on the basis of the financial statements.”<sup>8</sup>

## Common ESC Pitfalls

Another important consideration of ESC implementation is the potential pitfalls. Definitions of pitfalls include “a factor causing trouble in achieving a positive result or tending to produce a negative result” or “an unforeseen or unexpected difficulty.”<sup>9</sup>

One of the primary responsibilities of the ESC is to periodically assess the overall safety performance of the organization. Part of this assessment includes reviewing significant incidents that occur. The review of these incidents should include a self-critical analysis, such as the identification and remediation of causal factors identified by the incident investigation. Having the ESC involved at some point during this activity assures support and focus on corrective measure determination and effective implementation, which can help improve an organization’s overall safety performance. Another important aspect of this review process that all committee members must fully appreciate is that **all** employee safety issues must be addressed by the Executive Safety Committee for review or discussion in an effort to eliminate or control the identified hazardous situation.

Failure of an ESC to appropriately address safety and health-related concerns presented before it, allows potentially hazardous conditions to exist within the organization’s operations. If these conditions actually exist and employees are seriously injured or killed as a result of working in or around these conditions, the potential for significant legal consequences exist for both the organization as an employer and personally for individual committee members.

This legal potential may be realized after a catastrophic incident occurs and an OSHA investigation determines that a company’s conduct is proven to have met elements of Criminal Willful Violations. The specific elements of a Criminal Willful Violation are:

- An organization violated an OSH Act standard, rule or order (the general duty clause is not included).
- The result of the violation caused an employee’s death.
- The employer violated the standard knowing of the requirements and choosing not to comply (malice or mal-intent is not required).

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<sup>8</sup> Answers.com, “Materiality,” <http://www.answers.com/topic/materiality-2>.

<sup>9</sup> Answers.com, “Pitfall,” <http://www.answers.com/topic/pitfall>.

- An employee of the organization was affected, which includes all employees at a worksite not only the organizations employees, i.e., the multiemployer worksite doctrine.<sup>10</sup>

While the OSH Act applies to organizations as “employers,” the term “employer” has been interpreted to include individual liability for corporate officials and managers who, through their daily activities, exercise sufficient control over operations to be considered “employers.” Criminal penalties can include imprisonment for up to six months and a \$250,000 fine for individuals, or a fine of up to \$500,000 for corporations. Additionally, the statute of limitations is five years for criminal charges arising from the OSH Act.

To prosecute willful criminal safety and health cases successfully, OSHA has signed a memorandum of understanding with the U.S. Environmental Protection Agency (EPA) and the U.S. Department of Justice to utilize the Environmental Crimes Division of the U.S. Department of Justice. The EPA has a history of more aggressive regulatory enforcement than OSHA, with successful prosecution resulting in prison terms up to 15 years for individuals and fines totaling millions of dollars for organizations found in violation of the environmental statutes. The EPA has been known for enforcing the authority Congress provided under the federal environmental statutes to the fullest extent of the law.

#### Inappropriate Application or Overuse of Attorney-Client Privilege

At this point, the authors wish to point out that the subsequent discussion is being made from a perspective of limited experience regarding the application of attorney/client privilege. The authors are in no way attempting to provide or sponsor legal advice to the intended audience as it relates to what is/is not an effective claim to attorney-client privilege. Rather, the authors are making general statements designed to provoke thought around the very serious nature of high-level safety discussions within an organization.

In an effort to protect both the organization and its leadership from potential civil and/or criminal liability, organizations frequently involve attorneys in the ESC process and consider applying attorney-client privilege to ESC proceedings and its minutes and reports generated from the discussions. High-level executives within organizations may think that the simple inclusion of an attorney in the ESC proceedings evokes an effective claim to attorney-client privilege to these proceedings.

“Attorney-client privilege is a legal concept that protects communications between a client and his or her attorney and keeps those communications confidential.”<sup>11</sup> The general requirements for a valid assertion of attorney-client privilege in many jurisdictions in the United States are:

1. The asserted holder of the privilege is (or sought to become) a client; and
2. The person to whom the communication was made:
  - a. Is a member of the bar of a court, or his subordinate, and

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<sup>10</sup> U.S. Department of Labor, Occupational Safety & Health Administration, “OSHA Field Inspection Reference Manual CPL 2.103, Section 7 - Chapter III. Inspection Documentation,” [http://www.osha.gov/Firm\\_osh\\_data/100007.html](http://www.osha.gov/Firm_osh_data/100007.html).

<sup>11</sup> Wikipedia, “Attorney-client privilege,” [http://en.wikipedia.org/wiki/Attorney/client\\_privilege](http://en.wikipedia.org/wiki/Attorney/client_privilege).



- b. In connection with this communication, is acting as an attorney; and
3. The communication relates to a fact of which the attorney was informed:
  - a. By his client,
  - b. Without the presence of strangers,
  - c. For the purpose of securing primarily either:
    - i) An opinion on law, or
    - ii) Legal services, or
    - iii) Assistance in some legal proceeding,
  - d. And not for the purpose of committing a crime or tort; and
4. The privilege has been claimed, and
5. The privilege has not been waived.<sup>12</sup>

### Limits of Attorney-Client Privilege

When an attorney is not acting primarily as an attorney but, for instance, as a business advisor, member of the Board of Directors or in another nonlegal role, then the privilege generally does not apply.<sup>13</sup>

Attorney-client privilege protects the confidential communication and not the underlying information. For instance, if a client has previously disclosed confidential information to a third party who is not an attorney, and then gives the same information to an attorney, the attorney-client privilege will still protect the communication to the attorney but will not protect the communication with the third party.

To help preserve claims of privilege to ESC meetings, all members of the ESC must consider the level and detail of discussions that are brought before the ESC and whether those discussions may be more appropriately held with counsel separately to obtain the benefit of counsel's legal analysis. Organizations have varying thresholds of detail and facts discussed during ESCs. It is important for an ESC process to determine and regulate the level of the granularity of discussions held during the ESC meetings. Often an organization's general counsel will help provide definition of the level of detail required in ESC discussions.

### Additional Pitfalls Organizations Must Try to Avoid

1. Failure to act on issues impacting job satisfaction and the overall "culture" of an organization.

Failure to address issues brought before the ESC may have an unintentional negative effect on the attitudes and perceptions of the company's employees when considering how committed an organization is to providing a safe and satisfying workplace. Organizations that have active labor organizations such as unions, may consult with these partners when considering implementation of broad policy that will affect large portions of the workforce. Having employee endorsement of ESC activities and decisions obviously helps control unintentional negative perceptions and consequences.

2. Appointees are not able to function in the role required by the committee charter.

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<sup>12</sup> Wikipedia, "Attorney-client privilege, General requirements under United States law"  
[http://en.wikipedia.org/wiki/Attorney/client\\_privilege](http://en.wikipedia.org/wiki/Attorney/client_privilege).

<sup>13</sup> Wikipedia, "Attorney-client privilege, Limits of attorney-client privilege,"  
[http://en.wikipedia.org/wiki/Attorney/client\\_privilege](http://en.wikipedia.org/wiki/Attorney/client_privilege).

As previously stated, when selecting ESC members, it is important to consider the member's attributes, such as their organizational authority, experience, and operation knowledge. Failure to do so may cause the committee to be viewed as outside of the operational process and potentially diminish overall ESC effectiveness.

3. Committee ownership and function managed by a shared service group within an organization rather than by an operational function.

The potential result of ESC ownership by a shared service group is a lack of executive and operational ownership and ineffective ESC member participation. Without ownership at the executive and operations level, the organization may lack clear safety and health process direction.

4. Committee Charters not aligned with financial and operational considerations.

As discussed previously, a common requirement for a successful ESC is that the process be imbedded within the operational business framework. If the ESC and its role and function are viewed as separate and distinct from operational and financial goals and processes, the ESC may not be as effective as it could be.

## **ESC Implementation Considerations**

Once you have reviewed the roles, responsibilities, common structures, appointment considerations, connection to sustainability, and the pitfalls of an ESC, the next step is to determine if your organization is ready to implement an ESC. Several basic questions should be considered before a decision can be made. Key questions and considerations include:

### **Is there a serious interest and support for an ESC by the executive-level management?**

It is important to make sure that corporate level interest and support for implementing an ESC is determined after the corporate-level decision makers fully understand the benefits and the inherent responsibilities of both having an ESC and being a member of the committee, as well as participating in committee activities.

### **Does the organization have a formal safety process in place that includes adequate EHS staffing to help support the process?**

Appropriate EHS staffing in an organization provides the infrastructure to develop and implement safety and health policies and procedures that protects employees. This same infrastructure provides the opportunity for continuous improvement of the safety and health process through regular auditing of the processes and addressing audit findings, improving the overall effectiveness of the program.

### **Is there a willingness by the organization to allow for formal communication of the ESC process to occur throughout all levels of the organization?**

Formal communication of the ESC process should be done to enhance the entire organization's understanding of the potential improvement to the entire safety and health process. This communication would publicize the charter of the ESC, the members of the ESC, and the anticipated benefits of having an ESC as part of the overall safety process.

**Does the organization have a measurement process that provides safety performance indicators (leading and/or lagging)?**

What is the management team's level of understanding of how to manage the safety process using these indicators? The existence or lack thereof, of an effective measurement process providing effective feedback on the overall safety process performance may be indicative of an organization's commitment for continuous improvement in the safety process.

**Does every organization have an ESC?**

The answer is no. A non-scientifically validated analysis of over 250 companies in the retail, construction, food service, hospitality, manufacturing, healthcare, telecommunication, and transportation industries indicated that 16 percent of these companies have an ESC process similar to those defined in this discussion. All hospitals were found to have an ESC. Since 2001, each hospital has been required by the Joint Commission on Accreditation of Healthcare Organizations (JCAHO) to have someone designated to carry safety responsibilities. The sample outline for a Patient Safety Plan available on the Joint Commission Resources Web site includes a section on structure, which outlines management and oversight of the program with reporting of results to the executive organizational staff. When the hospitals were removed from the data set, approximately 7 percent of the companies had executive-level safety committees.<sup>14</sup>

**If an organization does not have an ESC is it lacking a safe and healthful workplace for its employees?**

Our research indicates that not all organizations have an executive-level safety committee. They are more common to hospital and universities. As a result, it would not be appropriate to make a general statement claiming that if an organization does not have an ESC process it is not effectively promoting safety. As previously mentioned, each organization must determine if the level of safety and health oversight and safety and health performance are adequate, and if not whether or not the potential risks and benefits of implementing an ESC would warrant implementation.

**Will an organization's safety performance be better if an ESC is implemented?**

Again, to answer this question directly is not possible. However, when referencing the different professional and rating organizations and regulatory programs, they imply that an ESC may help provide or maintain positive momentum and support behind an organization's safety and health process. One might argue that determining whether or not a company's safety and health performance could be improved by the implementation of an ESC might be a prudent business activity.

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<sup>14</sup> Joint Commission Resources, "Patient Safety, Sample Outline for Patient Safety Plan," [http://www.jointcommission.org/PatientSafety/pt\\_safety\\_plan.htm](http://www.jointcommission.org/PatientSafety/pt_safety_plan.htm).

## What makes an ESC successful?

The authors interviewed representative companies who have successfully implemented an ESC. The key themes found are connectivity to operations and integration into the business process.

Joseph Frabotta, Director of Human Resources for BWAY Corporation headquartered in Atlanta, Georgia, led the recent establishment of an ESC. This executive-level safety committee includes the President and Chief Executive Officer, the Chief Financial Officer, the Vice President of Administration, Chief Operating Officers for each division, the Vice President of Manufacturing and Engineering, the Vice President of Engineering and Technical Services, the Insurance Carrier Loss Prevention Account Consultant, Insurance Broker Risk Control Services Manager, and Senior Loss Control Consultant. BWAY's ESC meetings are held separately and the meetings are focus on 100 percent safety. The agendas for the meeting are set jointly and the Return-to-Work Coordinator and Injury Counselor provide the safety statistics.

Patrick McNutt, Director Safety Management and Employee Development for Darling International of Irving, Texas, shared the structure of his companies ESC. The Darling International Executive Safety Committee meetings are held in conjunction with the monthly overall operational review. The committee includes the Chief Executive Officer, Chief Financial Officer, both Chief Operating Officers, Regional Vice Presidents, the Director of Safety Management, and Operations Executives. Accident rates, statistics, and trends are reported by the Director of Safety Management and a portion of the Operations Executives. There are real benefits in the ownership and "peer pressure" that results from accident statistic reviews at this level.

Additional considerations for the implementation of an ESC:

- Set meeting dates shortly after the end of each financial quarter to help sustain a high-level of focus. Doing this may help reduce the potential for short-term "fixes" and the impact of this focus on the decisions made will be more long term.
- Include ESC results in Sustainability or Corporate Responsibility Reports either initially and/or updated on a consistent basis. This will reinforce the operational ownership and ESC success at the executive level.

## Conclusion

As one might have determined, a discussion and process that began with a very simple question was, as often is the case, ultimately more complicated than a simple "yes" or "no" answer. As demonstrated throughout the discussion, organizations often struggle to determine whether or not they should implement an executive-level safety committee process. Throughout this discussion the authors have highlighted specific aspects of the ESC process that should be considered when making these decisions. Specifically, highlighting its **Purpose, Roles and Responsibilities, Common Structures; ESC Appointment Considerations; Connectivity to Sustainability; Common ESC Pitfalls; and ESC Implementation Considerations.**

The ultimate goal of this discussion was to provide a framework and tools that will help Environmental Health and Safety professionals and other business managers to consider if the establishment of an executive-level safety committee is a concept that should be pursued within their organization. Organizations have a responsibility to provide their employees with a safe work environment and the implementation of an Executive Safety Committee may be one way to help meet this responsibility.

The key to success of any structure its sponsorship by operations and an ESC is no different, the ESC should be being owned by operations as part of the business process. If the ESC is owned by Environmental Health and Safety, Human Resources, or any other shared service department, it, by default, becomes outside of the normal business process and loses focus.

The authors of this discussion hope that the points highlighted provoke thought and further dialogue, which ultimately lead to processes in the workplace that provide safer work environments in all organizations.

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