

The Greater Cleveland Safety Council

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SAFETY AUDITS & HOW TO PREPARE FOR AN OSHA VISIT

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Discussion Items

- ❖ Reasons for an OSHA Inspection
- ❖ How Safety Benefits Business
- ❖ Management Involvement
- ❖ Hazards in the Workplace
- ❖ Value of Safety Audits
- ❖ Proceeding with an OSHA Inspection

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How Does Your Company Rank?

Does your Company?

- ❖ Just meet regulatory requirements
- ❖ Industry Leader
- ❖ Recognized by others
- ❖ Part of regular business

What would you be able to tell a Compliance Safety and Health Officer (CSHO) about your safety programs?

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OSHA Workplace Visits

A Programmed Inspection:

A special emphasis program

An Un-programmed Inspection:

In response to a report of specific health and safety hazard

Complaint or Referral:

An employee complaint or referral from an outside source

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Inspections can consume resources

- ❖ Money: can be replaced, eventually.
- ❖ Time: cannot be replaced.

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Good for Business

- ❖ Reduction of workplace injuries
- ❖ Reduction of workplace illnesses
- ❖ Effective accident prevention programs
- ❖ Good employee morale

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Employees are commodities

- ❖ Experience
- ❖ Training
- ❖ Efficiency/Productivity
- ❖ Leadership
- ❖ Commitment/Dedication

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Maintain a safe and healthy workforce

- ❖ Would an employee call OSHA?
- ❖ Does morale affect your productivity?
- ❖ Do employees feel valued?

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Employers must meet basic requirements

Occupational Safety and Health (OSH) Act was adopted in 1970.

Employers need to provide a safe and productive environment for employees.

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Safety Programs

- ❖ Do not treat as insurance policy
- ❖ Adopted as part of your overall operation

Protecting workers protects the employer.

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Statistics

- ❖ There are about 12 deaths each day in the USA from work related injuries.
- ❖ OSHA reports that U.S. employers spend about \$170 billion annually.

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Incidents can tie up resources

- ❖ Providing first aid/medical attention
- ❖ Completing accident reports
- ❖ Accident review/investigation
- ❖ Workplace slow down/stoppage

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Good Value for Business

- ❖ \$1 spent on safety realizes \$4-\$6 in savings (OSHA)
- ❖ Decrease in injury/illness rates & worker fatalities
- ❖ Reduced medical costs
- ❖ Costs for workers compensation will drop
- ❖ Absenteeism rates decrease
- ❖ Turnover rates lower
- ❖ Morale improves
- ❖ Productivity increases

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Changing the Culture

- ❖ Credibility of management/commitment
- ❖ Employee participation
- ❖ Evaluation & identification of workplace hazards
- ❖ Implementation of control measures
- ❖ Employee training

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Safety as a Core Value

Starts with written Safety & Health Programs

- ❖ Establish your standards & values on paper
- ❖ Make personnel aware of them
 - ❖ Communication is essential for success

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Progress & Performance

Key Performance Indicators (KPI)

- ❖ Some data tracked for OSHA
 - ❖ Lost time
 - ❖ Days away from work
- ❖ Helps keep everyone focused on goals

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Progress & Performance (cont.)

Without KPI

- ❖ Difficult to determine if achieving goals
- ❖ Difficult to determine path forward

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Commitment to Safety & Health

- ❖ Provide adequate resources
- ❖ Participate in safety reviews
- ❖ Attend safety training sessions

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Complying with OSH Policies

Hold everyone accountable

Can discourage reporting of unsafe acts:

- ❖ Fear of personal reprisal
- ❖ Penalty for reporting

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Complying with OSH Policies (cont.)

Keep employees engaged:

- ❖ Ask for input/feedback
- ❖ Your staff is a resource for problems

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Four “C’s” of a Safety Culture

- ❖ Control
- ❖ Co-operation
- ❖ Communication
- ❖ Competence

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Safety Audits

- ❖ Take control of your safety culture
- ❖ A valuable tool
- ❖ Avoid accidents
- ❖ Keep business on right track
- ❖ Minimize interruptions

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Planning Ahead

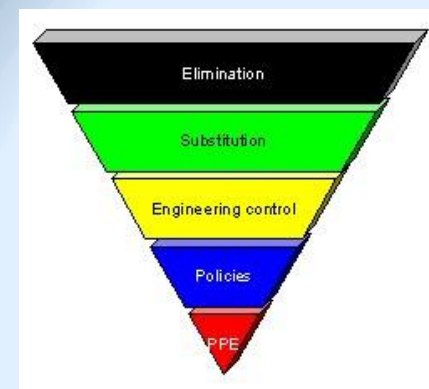
Job Hazard Analysis (JHA):

- ❖ Assess tasks performed by employees
 - ❖ Identifies workplace hazards
- ❖ Establish work procedures
 - ❖ Create safe work practices
 - ❖ Use of hazard control measures

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Hierarchy of Controls System



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Hierarchy of Controls

- ❖ Elimination/Substitution
 - ❖ Remove or eliminate the hazard
 - ❖ Replace the material or piece of equipment
 - ❖ Most difficult to use
- ❖ Engineering Controls
 - ❖ Keeps hazard away from worker
 - ❖ Independent of worker actions
 - ❖ Affords high level of protection

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Hierarchy of Controls (cont.)

- ❖ Policies or Practices (Administrative)
 - ❖ Revise work procedures
 - ❖ Need job-specific training
 - ❖ Common and effective control
 - ❖ Requires employee participation

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Hierarchy of Controls (cont.)

- ❖ Personal Protective Equipment (PPE)
 - ❖ Last line of defense
 - ❖ Reduces the risk of harm
 - ❖ Requires significant employee participation
 - ❖ Can be hardest to implement and/or enforce

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Audits & Inspections

- ❖ Evaluate effectiveness of process
- ❖ Gauge level of compliance
- ❖ Identify problems/oversights
- ❖ Provide quality assurance

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Safety Audit/Inspection

- ❖ Choose your Inspector(s)
 - ❖ Must be qualified
 - ❖ Must be knowledgeable
 - ❖ Able to identify problems/concerns
- ❖ Review effectiveness of safety management
- ❖ Documentation
- ❖ Feedback from employees

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Periodic Safety Inspections

- ❖ A single audit only provides a glimpse
- ❖ Collect meaningful data
- ❖ Identify problems sooner
- ❖ Make better decisions
- ❖ Better gauge of safety performance

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Auditing for Safety

- ❖ Reduces the chance for accidents
- ❖ Shows your intent to make the workplace safer
- ❖ Reinforces that safety is important
- ❖ Shows management's commitment
- ❖ Identifies gaps in the program
- ❖ Ensures accountability
- ❖ Act as an enforcement tool

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Accident Analysis

- ❖ Identifies gaps in safety processes
 - ❖ Gaps are found after an incident occurred
- ❖ Corrective action
 - ❖ Reduces the chance of a repeat occurrence

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OSHA on the Jobsite

- ❖ Manage the situation
- ❖ Be prepared beforehand
 - ❖ Outline a procedure
 - ❖ Let employees know their role
 - ❖ Expedite the investigation process

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During an OSHA Visit

As part of your management process:

- ❖ Designate a company representative
- ❖ Authority to grant access
- ❖ Ask to see their credentials

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During an OSHA Visit (cont.)

As part of your procedure:

- ❖ Have an opening conference
- ❖ Reason for the visit
- ❖ Keep the visit focused on that reason

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During an OSHA Visit (cont.)

Escort the CSHO around the workplace

- ❖ Not familiar with the specific work hazards
- ❖ Allows you to see what the CSHO is looking at
- ❖ Facilitate access

This exercises control and expedites the process

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During an OSHA visit (cont.)

If the CSHO finds any non-compliant items

- ❖ Correct the issue as soon as possible
- ❖ Document that the corrections were done
- ❖ Follow-up and notify OSHA of corrections

The non-compliance issue will be noted, but the report will also show it was abated.

During an OSHA Visit (cont.)

Duplicate information from the inspection:

- ❖ Take notes
- ❖ Take photographs
- ❖ Collect samples or split samples to be tested
- ❖ Take measurements of locations or items

Talking with OSHA

- ❖ Always best to cooperate
- ❖ Be mindful of what you say
- ❖ Statements will be considered factual
- ❖ Intentionally providing false information is unlawful
- ❖ Focus on the facts
- ❖ Have the right to representation during interviews

At the End of OSHA's Visit

- ❖ Have a closing conference
- ❖ Discuss initial findings of the inspection
- ❖ Request for records/documents

Receiving a Citation

- ❖ Summary of alleged violations
- ❖ Have fifteen (15) days to respond/contest
- ❖ After 15 days, the citation will be finalized
- ❖ Cannot contest after it is final

Contesting a Citation

- ❖ Option to have an informal conference
- ❖ Chance to negotiate settlement
- ❖ Opportunity to obtain assistance with negotiation
- ❖ Determine your strategy
- ❖ Attempt to reach a settlement

Administrative Judicial Process

- ❖ A complaint is filed with the occupational Safety & Health Review Commission
- ❖ Employer must respond to complaint
- ❖ A court hearing will be schedule
- ❖ Administrative Judge will issue findings/decision
- ❖ Right to file exceptions with Review Committee
- ❖ Can also petition Court of Appeals for a Judicial Review

Benefits of Safety Audits

- ❖ Eliminate/reduce risk from hazards
- ❖ Insure compliance
- ❖ Better safety record
- ❖ Prevent future accidents
- ❖ Improve your safety management system
- ❖ Increase management awareness
- ❖ Improve morale
- ❖ Facilitate better employer/employee relations
- ❖ Achieve OSH objectives & goals
- ❖ Create a responsible image in your market place

Things you SHOULD do

Avoid Business Interruptions!

When OSHA arrives

- ❖ Cooperate with the CSHO
- ❖ Provide an escort
- ❖ Keep the CHSO focused on the reason for the inspection
- ❖ Provide a list of witnesses
- ❖ Provide a copy of the incident report (if available)

Things you SHOULD NOT do

Wait for something to happen.

When OSHA arrives

- ❖ Do not draw conclusions
- ❖ Do not share witness statements
- ❖ Do not conduct joint interviews
- ❖ Do not accept intimidating or aggressive behavior

Thank you



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