

Health & Safety Inspections & Audits

Dr. Scott Smith | CSP
Safety & Health Director
Tighe & Bond



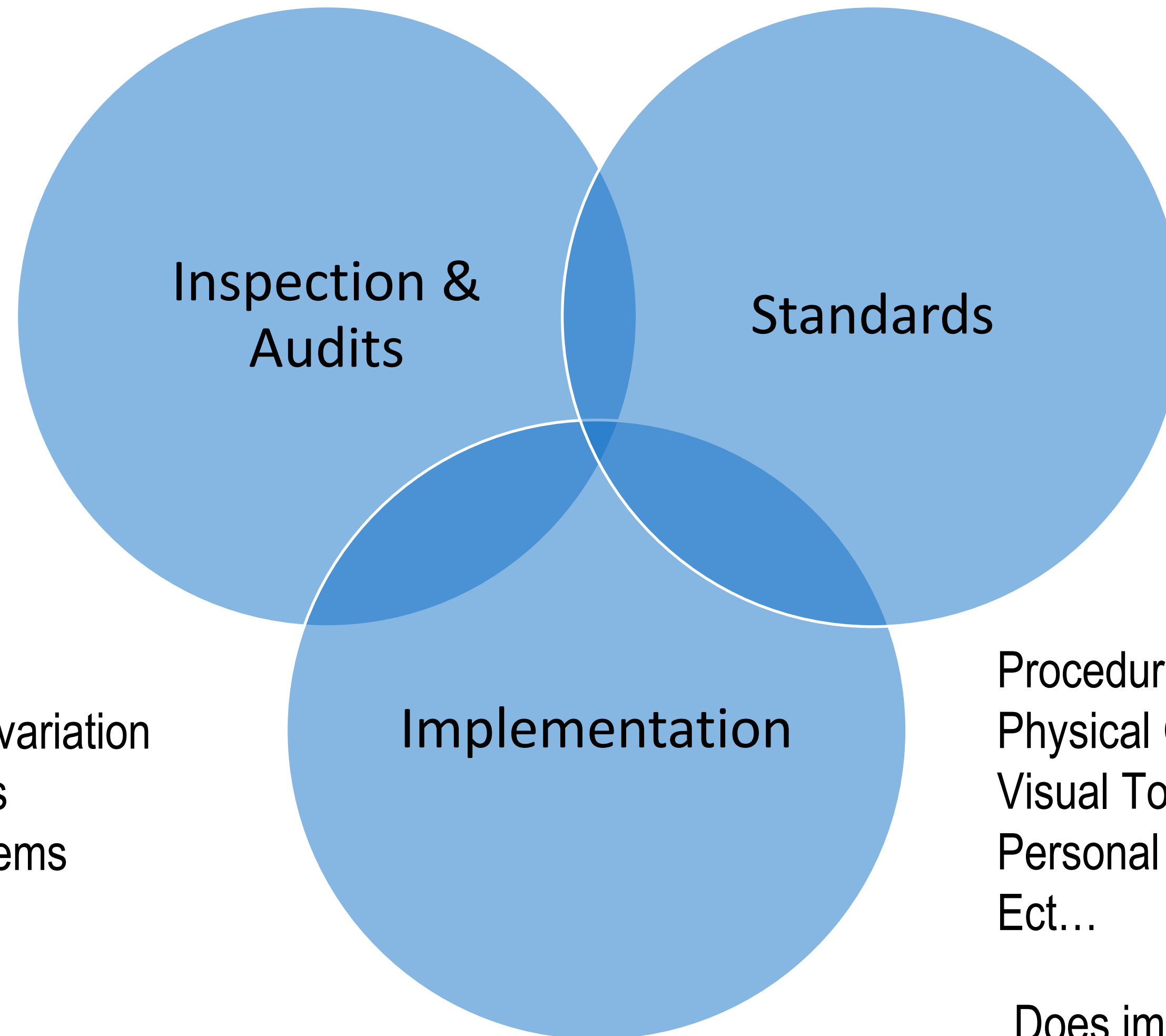
Health & Safety Inspections & Audits

- Why should we perform H&S Self-Audits
- Who needs to participate
- What do we need to look for
- What kind of facilities / sites need to be checked
- Are there federal requirements
- State level MA-OSHA & DLS requirements
- What if we do not perform audits



Health & Safety Inspections & Audits

Document Audits
Facility Audits
Process Audits
Site Audits
Equipment Audits
Ect...



OSHA
State
City
NFPA
EPA
Etc....

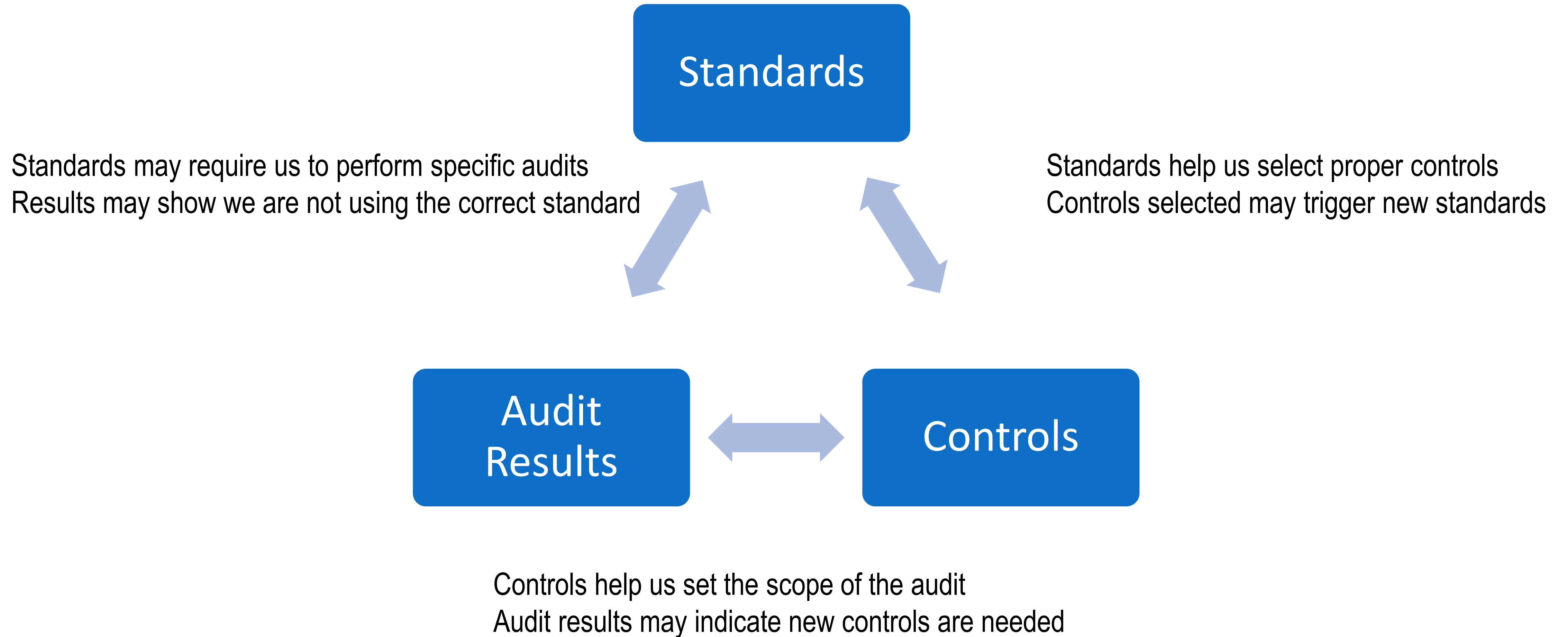
Are we using up to date standards?

Are we looking for the correct variation
Does the audit meet standards
Does output lead to actional items

Procedures / Training
Physical Guards
Visual Tool sets
Personal Protection Devices
Ect...

Does implementation meet standards?

Health & Safety Inspections & Audits



Why should I do H&S Self-Audits?

- Worker Safety – Everyone should go home healthy at the end of the day
- Process Success – Process and equipment that are safe yield better returns
- General Duty Clause – OSH Act 1970, Employer Responsibility to provide a safe workplace
- H&S Compliance – Local, State, Federal, Fire Safety ...
- Be Proactive – Identify potential safety issues
-

Health & Safety Inspections & Audits

Why should I do H&S Self-Audits?

- Interaction with Staff – Staff are the front-line process owners – have hand on knowledge
- Evaluate Performance – Training, documentation, policy compliance - are we providing the best training
- Equipment Inspections – Machinery, heavy equipment, safety equipment – are we providing a safe tool

The Ultimate Goal is Worker Safety!

(Through Preventing Worker Injury & Illness)



Health & Safety Inspections & Audits

Why should I do H&S Self-Audits?

It's a legal (OSHA) obligation to provide the safest workplace possible

“provide a place of employment which are free from recognized hazards that are causing or are likely to cause death or serious physical harm to his employees...”

Employees can be cited under the General Duty Clause if

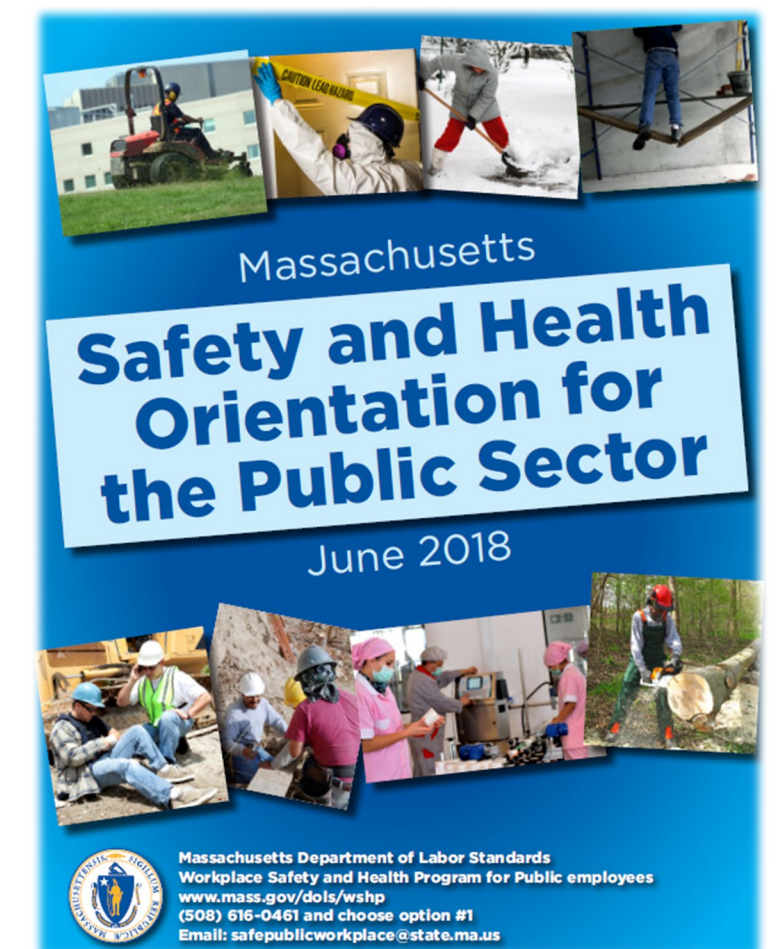
- a. The employer failed to keep the workplace free of a hazard to which employees of that employer were exposed;*
- b. The hazard was recognized;*
- c. The hazard was causing or was likely to cause death or serious physical harm; and*
- d. There was a feasible and useful method to correct the hazard.*

Health & Safety Massachusetts Regulations

MA Workplace Safety Regulations Background

- Federal OSHA Regulations continue to apply to all private sector employers in MA
- MA General Law Chapter 149 § 6-1/2 “Act Relative to Standard of Employee Safety”
 - 2014: Authorized Department of Labor Standards (DLS) to ensure that State workers were provided the same protections for a safe workplace as current OSHA standards
 - 2018: DLS authority expanded to include local (municipal) workers

<https://www.mass.gov/doc/safety-and-health-orientation-booklet-for-the-public-sector-0/download>



Health & Safety Massachusetts Regulations

MA Workplace Safety Regulations Background

- MA General Law Chapter 149 § 6-1/2 “Act Relative to Standard of 2019: DLS established the “Workplace Safety & Health Program” (WSHP) & began inspections of State & Municipal employers
 - 2020: DLS developed draft “State Plan” for review by Federal Dept. of Labor (DOL)
 - August 2022: Draft State Plan approved by DOL

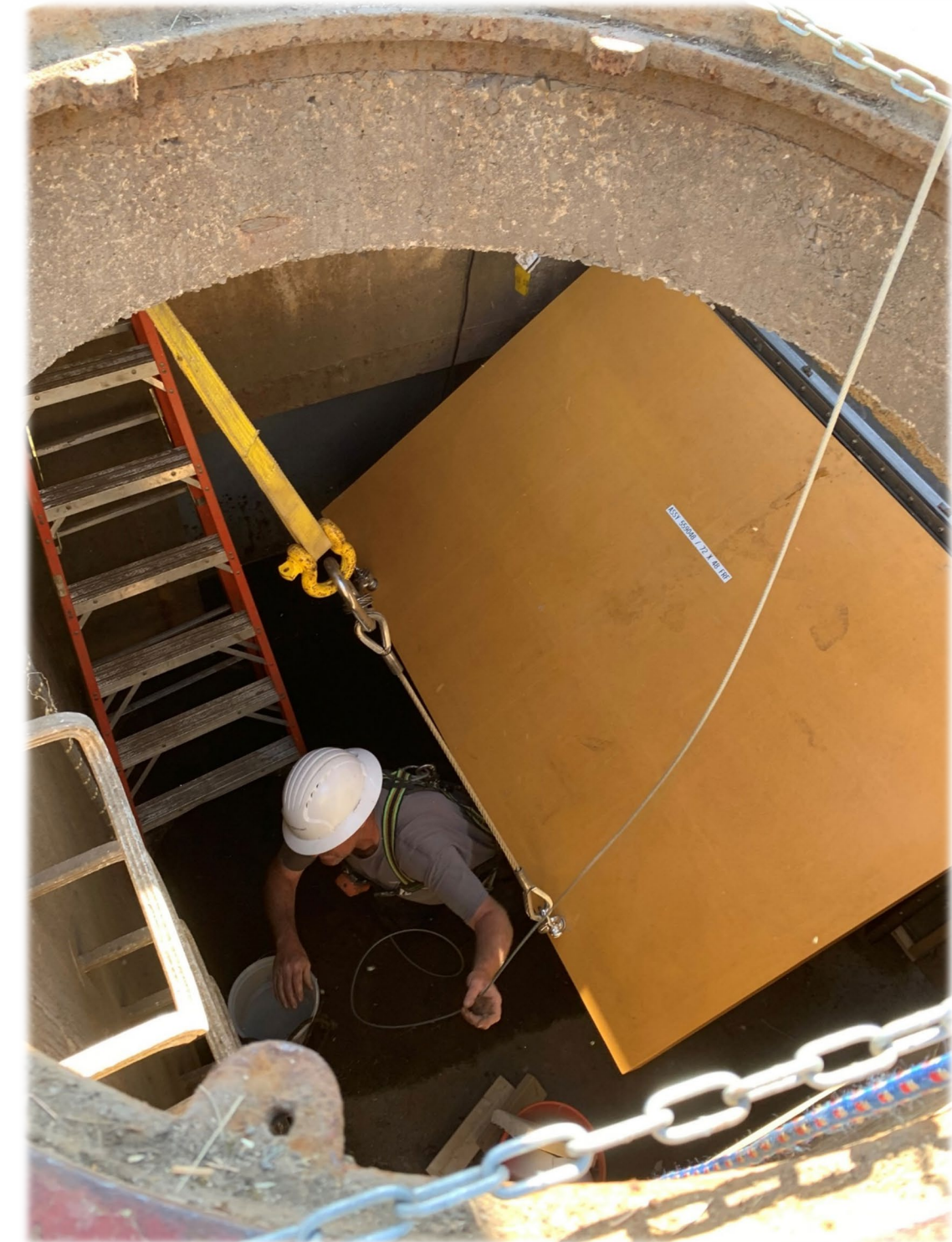
There are 22 states that have OSHA State Plans for private & public workers, 9 states have State Plans for state & municipal workers only

Health & Safety Massachusetts Regulations

MA Workplace Safety Regulations

DLS Enforcement of State Plan:

- DLS adopted current OSHA regulations & incorporated into WSHP
- Local (town, municipal) & State Employers must meet the minimum requirements OSHA regulations
- DLS conducts inspections of facilities & work sites:
 1. Imminent Hazards (fall protection, work at heights, confined space, etc.)
 2. Workplace Injury/Illness or Fatality
 3. Voluntary programs
 4. Complaint based
 5. Planned Programs



Workplace Health & Safety Audits

What kind of Work Sites Need Evaluation?

- Facilities
 - Manufacturing, Warehousing, Distribution
 - Wastewater & Water Treatment Facilities
 - State & Municipal (DPW, Parks & Rec, Sanitation, Schools)
- Operations
 - Roadways, Material Handling, Manufacturing Processes, Crane Work
- Construction Sites
 - Excavation
 - Elevated Work (scaffolding, fall protection)
 - Concrete Work
 - Worker Hazards (Asbestos, Silica, HazMat)



Workplace Health & Safety Audits

What kind of Work Sites Need Evaluation?

- High Risk/High Hazard Activities
 - Power Equipment, Cutting Ops, Machinery Hazards

- OSHA & DLS – Imminent Danger Activities
 - Work at Heights/Fall Protection
 - Excavation/Trenching
 - Respiratory Hazards
 - Crane Ops



Workplace Health & Safety Audits

Conducting a Workplace Safety Inspections & Compliance Audits – What's the Scope?

Regulatory Compliance Audit:

- **H&S program review (Frameworks)**
 - Training
 - Record keeping
 - Medical Surveillance
 - Incident Reporting
- **Facility Safety (Implementation)**
 - Signage
 - Exits
 - ERP
- **HazMats & HazCom Program**
 - Hazards
 - Fall Protection
 - LOTO
 - Confined Spaces
- **Material Handling**
 - Usage
 - Storage
 - Movement

Workplace Health & Safety Audits

Conducting a Workplace Safety Inspections & Compliance Audits – What's the Scope?

Workplace Safety Inspection Process:

- **Schedule your inspection**
 - Let people know (nobody likes a surprise inspection!)
 - Unannounced audits can show “different” data (may limit participation from process owners)
- **Who do you want to come with you?**
 - Facility staff? Managers? Safety Personnel?
- **Have a plan for the scope of the inspection**
 - Stay focused on the goal of the audit
 - Audit creep can lead to frustration and lack of focus

Workplace Health & Safety Audits

Conducting a Workplace Safety Inspections & Compliance Audits – What's the Scope?

Workplace Safety Inspection Process:

- **Prepare a Checklist from your plan**
 - A single checklist may not be effective for all audits
- **Focus on worker hazards**
 - Obvious and hidden
 - Systematic and behavioral
- **Photos for every hazard**
 - Provide clarity for findings
- **Summarize/Report/Action Items/Due Dates**

Workplace Health & Safety Audits

Workplace Safety Inspection Process:

1. **Create an Inspection Strategy –Worker Safety**

Scope, Schedule, People, Applicable Regs & Standards

2. **Develop an Inspection Checklist**

Buildings and Structures

Areas/Rooms – production, storage, labs, shipping/receiving, etc.

Equipment – vehicles, heavy equipment, building-related ...

Worksite – construction, environmental, Roadway ...

3. **Conduct the Inspection**

Review work processes

Equipment & tools

Worker safety, PPE, hazard exposure

Use your checklist, take Photos, Photo log & notes

Focus on workplace hazards not regulatory compliance

Workplace Health & Safety Audits

4. Review & Summarize Inspection Findings

Highlight existing safe practices & people

List current workplace/worker hazards

Look for trends from previous inspections

Develop action items based on hazards – get staff involved in the “solutions process”

5. Implement the Corrective Actions

Work with managers on realistic goals & deadlines

Prioritize action items by hazard severity

6. Follow-Up

Action items completed on schedule

Progress reports

Are the corrective actions working? – talk to staff, get their opinions & ideas



Health & Safety Inspections & Audits

Was the audit successful and accurate:

Did the Audit Scope Evaluate all Gaps

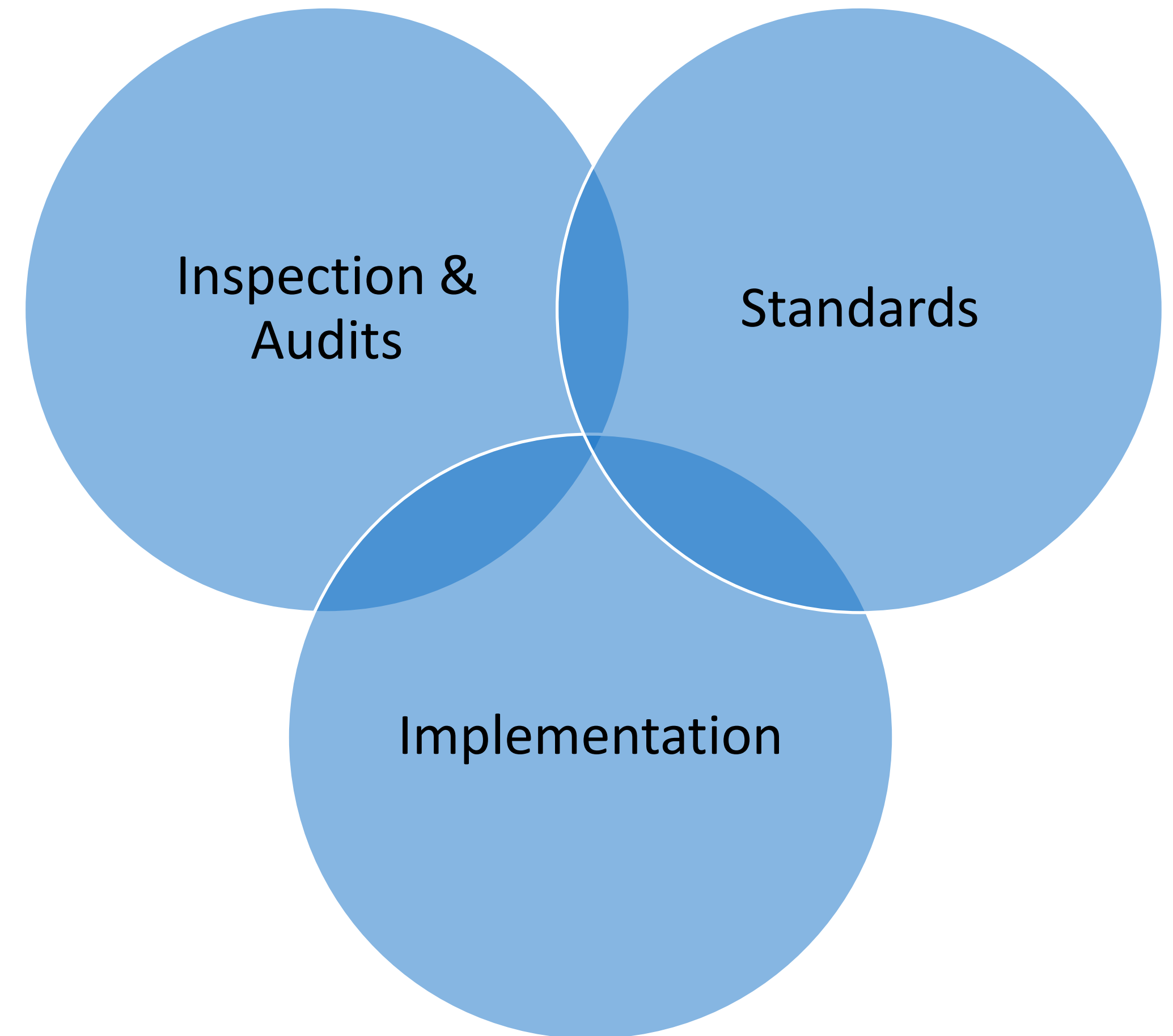
1. Did the records check incorporate changes to standards
2. Did the physical audit include all elements of implementation
3. Did the audit generate actionable items

Assigned actions

Trackable data

Illustrates steps for closure

Was it accurate and precise?



Workplace Health & Safety Audits

Workplace Safety Inspections – MA DLS Example Checklist

These are all OSHA General Industry Standards
If the scope included construction, this would not work

<https://www.mass.gov/doc/dpw-garage/download>

Self-Audit Safety Checklist for DPW Garage

Purpose:

This checklist is a guide to assist public employers provide a safe workplace and reduce the risk of work-related injuries. This is not a complete list, but includes some key items needed to initiate a safety program at your workplace. Refer to the actual standards for a more detailed description.

Building Name: _____ Date _____
Address: _____
Conducted by: _____

Facility Inspection – DPW Garage	Standard	Y	N	Correction Required
Electrical				
Electrical outlets and switches– cover plates installed.	1910.305(b)			
Receptacles are grounded.	1910.304(b)(2)(i)			
Receptacles in kitchens and wet locations have GFCI.	1910.304(b)			
Extension cords are not used for permanent wiring.	1910.305(g)(1)(ii)			
Power cords - Electrical grounding pins (3-prong) intact	1910.335(a)(3)(i)			
Power strips are not piggybacked.	1910.303(b)(2)			
Circuit panels have circuits labeled.	1910.303(f)(2)			
Circuit panels and boxes - unused openings are covered.	1910.305(b)(1)(ii)			
Circuit panels – access to panels is kept clear.	1910.303(g)(1)			
Fire Prevention				
Fire extinguishers–monthly visual check conducted.	1910.157(e)(2)			
Fire extinguishers–annual maintenance check	1910.157(e)(3)			
Flammables stored away from ignition sources.	1910.106(d)(5)(iii)			
Sprinkler heads – items not hung or obstructing sprinklers.	1910.159(c)(10)			
Floor Condition				
Floors kept clean and dry.	1910.22(a)(2)			
Broken, damaged floor or stair treads repaired.	1910.22(d)(1)			
Protruding object, loose boards, spills cleaned/repared.	1910.28(b)(3)(ii)			
Hazardous Chemicals				
Containers kept closed, labeled.	1910.1200(f)(6)			
Safety Data Sheet available for each product.	1910.1200(g)(8)			
Eyewash provided if chemical products are corrosive.	1910.151(c)			
Housekeeping				
Aisles clear, areas kept clean, dry and free of pests.	1910.141(a)			
Ladders				
Ladders are inspected before each initial use.	1910.23(b)(9)			
Ladders used according to purpose for which it is designed.	1910.23(b)(8)			
Lockout-Tagout				
Power is shut off before equipment maintenance (ie HVAC, appliances, lighting)	1910.333(a)(1); 1910.333(b)(2)			
Lockout-tagout equipment is available: tags, locks	1910.333(b)(2)(iii)			

Workplace Health & Safety Audits

Broader OSHA Checklists – 1910 General Industry
Some have further detail on what to ask

<https://www.ehso.com/OSHA%20Self-Inspection%20Checklist.pdf>

HAND AND PORTABLE POWERED TOOLS

Hand Tools and Equipment

Yes	No	Requirement
		Are all tools and equipment (both company and employee owned) used by employees at their workplace in good condition?
		Are hand tools such as chisels and punches, which develop mushroomed heads during use, reconditioned or replaced as necessary?
		Are broken or fractured handles on hammers, axes and similar equipment replaced promptly?
		Are worn or bent wrenches replaced regularly?
		Are appropriate handles used on files and similar tools?
		Are employees made aware of the hazards caused by faulty or improperly used hand tools?
		Are appropriate safety glasses, face shields, etc. used while using hand tools or equipment which might produce flying materials or be subject to breakage?
		Are jacks checked periodically to ensure they are in good operating condition?
		Are tool handles wedged tightly in the head of all tools?
		Are tool cutting edges kept sharp so the tool will move smoothly without binding or skipping?
		Are tools stored in dry, secure locations where they won't be tampered with?
		Is eye and face protection used when driving hardened or tempered spuds or nails?

Workplace Health & Safety Audits

Fall Protection > 6 Feet

OSHA Has Checklists as well – 1926 Construction

General Industry requires fall protection at 4 feet

<https://osha.llr.sc.gov/pdfs/construction%20check%20list.pdf>

ITEM	YES	NO
General requirements: Is walking/working surface strong enough to support employees and the work to be done? 1926.501(a)(2)		
Are employees on walking/working surfaces with unprotected sides and edges protected by guardrails, safety nets or personal fall arrest systems? 1926.501(b)(1)		
Are employees who are constructing leading edges protected by guardrails, safety nets or personal fall arrest systems if feasible? (If not feasible, requirements of paragraph (k) of 1926.502 must be met) 1926.501(b)(2)(i)		
Is each employee in a hoist area protected by either guardrails or personal fall arrest system? 1926.501(b)(3)		
In hoisting areas where guardrails are used and guardrails are removed to facilitate landing of material and the employee must lean out over the edge or through the access opening, is <i>that</i> employee protected by a fall arrest system? 1926.501(b)(3)		
Are employees exposed to falling through holes (including skylights) protected by fall arrest systems, guardrails or covers? 1926.501(b)(4)(i)		
Are employees on walking/working surfaces protected from tripping or stepping into holes by covers? 1926.501(b)(4)(ii)		
Are employees on walking/working surfaces protected from objects falling through holes by covers? 1926.(b)(4)(iii)		
Are exposed employees working on the face of form work or reinforcing steel protected by fall arrest systems, safety nets, or positioning device systems? 1926.501(b)(5)		
Are exposed employees working on ramps, runways or other walkways protected by guardrail systems? 1926.501(b)(6)		
When excavations, wells, shafts, pits, are not readily seen (shrubs, plants, etc.) are employees protected by guardrails, fences, or barricades? 1926.501(b)(7)(i) and (ii)		

Workplace Health & Safety Audits

Summary:

- Safety Audits are a requirement at the federal and state level
- Audits should incorporate current standards and expectations
- These measure compliance, awareness, risks, and controls (not point fingers)
- Follow a structured format to ensure you are auditing to an established scope
- Incorporate leadership on walks and integrate employees into the data collection
- Use photos to better explain findings where applicable (great toolbox talk material)
- Detail each finding, date of identification, expected correction date, and ownership
- Use toolbox talks and pre shifts to review findings to build culture and wider awareness
- The goal is to identify and correct, lead improvements, and drive safety culture