SAFETY OF THE FACELESS EMPLOYEE

Fill in for sick or injured employees

Increase output during short-term peaks in production

Allow labor flexibility during an uncertain economy

Difficulty hiring enough qualified full time workers

Special projects

Reduce labor costs

THESE PEOPLE MATTER TO YOUR COMPANY!
UNDERSTAND YOUR HURDLES TO SUCCESS

HURDLES TO OVERCOME

- Management attitudes
- Language and literacy
- Transient workforce
- Lack of time to train
- Not a company metric
NO VALUE PERCEPTION

- Disposable or interchangeable perception
- Believe the person is not invested or will never be invested in the company
- Not my employee
- Cost, Cost, Cost mentality
- Lack of respect for person and the job they are doing
  - “Warm Body Syndrome”

REALITIES OF SKEWED PERCEPTIONS

- Understand the focus of your management
  - What drives them?
    - Production, quality & delivery
    - Cost
    - Human element
- Focuses are constantly changing
- Illustrate to management how the safety of temporary employees benefits them
**WHAT’S IN IT FOR ME?**

- Reduction in turnover
  - Improved & more consistent production, quality, and efficiency
- Reduction in costs
  - Training time on process
  - WC costs and mark up
  - OT costs
  - Accident investigation & follow up
- Increase in morale
  - People feel safe at work
  - Helps instill employee commitment
    - Two way street
- Recruit & retain potential new hires from temporary workforce
  - Layoffs & lack of experience dictate temporary employment

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**OSHA & TEMPORARY EMPLOYEES**

- 4/29/13 - OSHA launched an initiative to protect temporary workers
- Initiative is very simple
  - CSHO denotes who is using temporaries & when they are exposed to a hazard
  - CSHO will assess if person is adequately trained in a language & vocabulary he or she can understand
- In a June 2013 presentation, David Michaels stated at least 14 temporary employees died during their first day at a new worksite in the last 12 months
- OSHA is working with the American Staffing Association and host employers to promote best practices
**OSHA & TEMPORARY EMPLOYEES**

- Between 4/29/13 – 7/18/13, 262 inspections have identified temporary workers exposed to safety & health violations.
- 270 violations have been cited at workplaces where temporary workers are present.
- Data is still maturing because some inspections are still open.
- Most frequent violations found at workplaces where temporary employees were identified included:
  - Electrical hazards
  - Hazards requiring LOTO protections
  - Machine guarding
  - Fall protection
  - Hazard Communication
  - Powered industrial truck

Thomas Galassi, Director OSHA Directorate of Enforcement Programs – 7/18/13 OSHA Webinar

**RECORDKEEPING**

- In 2011, there were 2.8 million temporary workers in the US according to BLS.
  - 2.3% of US Workforce
- Temp services injury & illness rate was 1.9 in 2011 according to BLS.
  - Private Industry – 3.5
- Difficult to account for all temporary injuries & illnesses.
  - No differentiation between temporary & full time injuries on BLS surveys.
- 1904.31 requires injuries & illnesses of employees not on your payroll to be recorded on your 300 log *if you supervise these employees on a day-to-day basis*.
AGENCY RELATIONSHIP AND PARTNERSHIP

UNDERSTAND YOUR HURDLES TO SUCCESS

NOT ALL AGENCIES ARE CREATED EQUAL

- Evaluate all agencies prior to choosing one
- Agencies should understand the joint responsibility they have to keep their employees safe and healthy
- Evaluate the following:
  - Agency loss history
  - Agency’s established safety procedures & expectations
  - Agency’s safety resources
  - Willingness to partner with you on safety initiatives & training
  - Experience staffing in your industry
AGENCY DUTIES

- Agencies have a duty to:
  - Determine what working conditions exist at the host employer’s work site;
  - Know the hazards of the workplace they are sending their employees into; and
  - Verify the host employer is fulfilling their responsibility to provide a safe working environment;
  - Ensure appropriate recordkeeping is performed.

Ignorance of hazards and conditions is not an excuse – Agencies are responsible for sending their employees to safe work places.

TWO WAY STREET

- Agencies should be evaluating host employers for the following:
  - Loss history
  - OSHA inspection data
  - Job descriptions & working conditions
  - Program establishment
    - Medical surveillance
  - Prohibitive jobs
    - Confined space entry
    - Haz waste handling

Contract considerations include:
  - Who will train
  - PPE & medical surveillance considerations
  - Prohibitive jobs
  - Recordkeeping responsibilities
Conduct a training needs analysis based on the jobs that will be conducted & match training to the job requirements
- Operating PIT vs. basic parts assembly with hand tools

Develop a matrix to be a reference & ensure training consistency

Use 300 log & accident reports to further assist in developing training needs

Special projects many times call for specialized training
- Confined space entry

Supervisors must understand what safety training is provided & what is needed in order to safely perform certain tasks
- Authorized vs. Affected
# MATRIX EXAMPLE

<table>
<thead>
<tr>
<th>Department</th>
<th>Exposures</th>
<th>Training</th>
</tr>
</thead>
<tbody>
<tr>
<td>Die Cast</td>
<td>A. Molten metal &amp; Mg fines</td>
<td>A. Magnesium handling</td>
</tr>
<tr>
<td></td>
<td>B. Repetitive motion &amp; lifting</td>
<td>B. Ergonomics</td>
</tr>
<tr>
<td></td>
<td>C. Powered industrial truck</td>
<td>C. PIT</td>
</tr>
<tr>
<td></td>
<td>D. Fire &amp; explosion</td>
<td>D. Fire extinguisher &amp; ERP</td>
</tr>
<tr>
<td></td>
<td>E. Sharp edges on parts</td>
<td>E. PPE</td>
</tr>
<tr>
<td></td>
<td>F. High noise levels</td>
<td>F. Haz Com</td>
</tr>
<tr>
<td></td>
<td>G. Heat</td>
<td>G. LOTO</td>
</tr>
<tr>
<td></td>
<td>H. CNC coolant &amp; die lube sump</td>
<td>H. Machine operation</td>
</tr>
<tr>
<td></td>
<td>I. Machine operation</td>
<td>I. Confined space – limited</td>
</tr>
<tr>
<td></td>
<td>J. Machine &amp; cell cleanup</td>
<td></td>
</tr>
<tr>
<td></td>
<td>K. Confined space – no entry</td>
<td></td>
</tr>
<tr>
<td>Bulk Feed</td>
<td>A. Powered industrial truck</td>
<td>A. PIT</td>
</tr>
<tr>
<td></td>
<td>B. High noise levels</td>
<td>B. PPE</td>
</tr>
<tr>
<td></td>
<td>C. Plastic on floor</td>
<td>C. Housekeeping</td>
</tr>
<tr>
<td></td>
<td>D. Fire</td>
<td>D. Fire extinguisher &amp; ERP</td>
</tr>
<tr>
<td></td>
<td>E. Grinder &amp; tilter operation</td>
<td>E. Haz Com</td>
</tr>
<tr>
<td></td>
<td>F. Grinder blade changes – NA</td>
<td>F. Machine operation</td>
</tr>
</tbody>
</table>

# WHY DO THEY PUT THEMSELVES IN HARMs WAY?

- Trying to make a good impression
- Language or literacy barriers
- Do not ask questions
  - Afraid to ask & get fired
- Embellished qualifications
- Do not fully understand the process or equipment
UNDERSTAND YOUR HURDLES TO SUCCESS

TRAINING PLAN

AGENCY RELATIONSHIP AND PARTNERSHIP

SURVEY TO IDENTIFY INJURY POTENTIALS

ESTABLISH A TRAINING PLAN

- Identify what training is needed to allow your temporaries to perform their jobs safely
- Define who will provide what training
  - **Agency** – General safety training for your company
  - **Host Employer** – Department & equipment specific
- Establish set training documents to ensure consistency
- Establish a system that evaluates understanding & ensures continued development

It is very important for employees to continue to develop their safety knowledge & your system should monitor that development
WHO WILL TRAIN?

- Dual effort between both companies
- Establish a training agreement
- Both companies must uphold their end of the agreement
- Host company should champion training development
AGENCY TRAINING

- Agency specific safety training
- General safety training from host employer
  - Hazards
  - General safety precautions
  - Safe work practices
  - General review of programs
- Utilize video and/or visual aids from the host employer
- Trainer should be knowledgeable about the host employer’s safety program & exposure
- Evaluate understanding

- Employees should not go to host employer unless they have an acceptable understanding of safety
- Host employer should determine what is an acceptable understanding of safety

EXCERPTS FROM A SAFETY MANUAL

TOOLS

- “Use the right tool for the job and that it’s sized for the work at hand.”
- “Shield sharp blades and tool points.”
- “Put tools away when they’re not in use. Store them in the right place.”
- “Make sure all electric tools are properly grounded and/or double insulated, and working properly.”

LADDERS

- “Use the right ladder for the job at hand.”
- “Move the ladder as close to your target as possible. Reaching more than an arm’s length can cause the ladder to tip and possibly fall over.”

Is a person now “trained” to work safely with tools and ladders?
UNDERSTAND
YOUR HURDLES
TO SUCCESS

GENERAL
AGENCY
TRAINING

SURVEY TO
IDENTIFY INJURY
POTENTIALS

HOST
EMPLOYER
TRAINING

AGENCY
RELATIONSHIP
AND
PARTNERSHIP

TRAINING
PLAN

UNDERSTAND
YOUR HURDLES
TO SUCCESS
HOST EMPLOYER TRAINING

- Department specific
- Machine specific
- Select the right trainer
- Use a checklist so nothing is missed
- Evaluate understanding
- Host employer should conduct any specialized training (i.e. PIT)

Establish a system to re-train and re-evaluate those who do not immediately show an acceptable level of understanding
**DEPARTMENT SPECIFIC TRAINING**

- Very important since it involves the area in which the person will be working every day

- Goal is to train them on the identified hazards & how to protect themselves from the hazards

- Cover such things as:
  - Hazards in the area
    - Forktruck traffic
  - Safe work procedures
  - PPE
  - Emergency procedures
  - Housekeeping requirements

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**TRAINING PLAN**

**MACHINE SPECIFIC TRAINING**

**AGENCY RELATIONSHIP AND PARTNERSHIP**

**HOST EMPLOYER TRAINING**

**DEPARTMENT SPECIFIC TRAINING**

**GENERAL AGENCY TRAINING**

**SURVEY TO IDENTIFY INJURY POTENTIALS**

**UNDERSTAND YOUR HURDLES TO SUCCESS**
MACHINE SPECIFIC TRAINING

- Operators must understand how a machine operates in order to safely work with it or around it.

- Train all employees as if they have no experience with the machines(s)
  - Bad habits can be developed in other facilities

- Cover such things as:
  - Hazardous movements
  - Modes of operation
  - Operating controls
  - Guarding
  - Setup of machine
  - Processes requiring LOTO

- Nuances of most machines can only be learned with time & experience – check on the person.
SAFETY MENTOR SYSTEM

- Establish a system which pairs a temporary up with a "safety mentor"

- Safety mentor should be a seasoned employee in their department

- Begins the social engagement for the person

- Purpose of the safety mentor is to establish the department safety culture with the new temporary employee
  - Answer questions
  - PPE verifications
  - “Safety check-ins”

Safety mentor qualifications:
- Seasoned employee
- Good safety record
- Positive attitude toward safety & company
- Good communicator

UNDERSTAND YOUR HURDLES TO SUCCESS
GENERAL AGENCY TRAINING
HOST EMPLOYER TRAINING
AGENCY RELATIONSHIP AND PARTNERSHIP
MACHINE SPECIFIC TRAINING
DEPARTMENT SPECIFIC TRAINING
TRAINING PLAN
MENTORING SYSTEM
SURVEY TO IDENTIFY INJURY POTENTIALS
UNDERSTAND YOUR HURDLES TO SUCCESS
SIGNS
SIGNs

- Extremely important safety communication tools
- Used to draw attention to specific hazards or requirements
- Not a substitute for training but should be used in conjunction with
  - Confined space
- Be discerning with your signs & target impact
  - Too many signs can minimize effectiveness
- Do not forget about potential language & literacy barriers

CONTINUOUS DEVELOPMENT

TRAINING PLAN

MENTORING SYSTEM

MACHINE SPECIFIC TRAINING

AGENCY RELATIONSHIP AND PARTNERSHIP

HOST EMPLOYER TRAINING

SIGNS

DEPARTMENT SPECIFIC TRAINING

GENERAL AGENCY TRAINING

SURVEY TO IDENTIFY INJURY POTENTIALS

UNDERSTAND YOUR HURDLES TO SUCCESS
EVALUATING DEVELOPMENT

- True understanding is learned over time
- Expect employee safety knowledge to increase over time
  - Tool box talks
  - Scheduled safety training
  - Familiarity with department procedures & equipment
- Test the employee's safety knowledge at set intervals to evaluate understanding
- Ensure all missed questions are reviewed thoroughly
- Establish a standard level of knowledge that an employee must accomplish to be employed

Agency should conduct testing at 30, 60, & 90 days
**TRAINING PLAN WRECKERS**

- Poor trainers & poor training techniques
  - “Here read this” method
- Language and literacy issues
- No established metrics
- Production demands & lack of management commitment
- No checks & balances in the system

**POOR TRAINING & TECHNIQUES**

- Identify trainers & prepare them
- Develop checklists to keep trainers on course
- Incorporate safety aspects in work instructions
- Utilize pictures, diagrams, and demonstrations to enhance your points
**LANGUAGE & LITERACY BARRIERS**

- Evaluate your local demographics & plan ahead for language and literacy issues
  - Agreement between agency & host employer should establish how these situations are to be handled
- Translate important safety documents in advance
  - In-house interpreters
- Pictures, pictures, pictures
- Do “hands on” training
  - Handing a document to someone & telling them to read it is not training
- Be prepared to read some documents to employees with literacy issues

**METRICS**

- Establishment of metrics illustrates commitment
- What safety knowledge does someone need to be safe in your facility?
- New employees should be required to achieve that level of knowledge as a condition of employment
- Management & supervision must to be held accountable for ensuring the safety process is implemented in their department(s)
- What gets measured gets done

**Metrics that can be used:**
- Training timeliness
- Training evaluation scores
- Number of at-risk behaviors
- Temporary safety contacts
- Safety audit results
- Safety meetings held
**PRODUCTION DEMANDS**

- Pre-train on as many safety aspects as possible
- Utilize shift overlaps
- Develop multiple trainers
- Streamline training
  - What is truly important?
- Develop specific training videos for processes

**CHECKS & BALANCES**

- Periodically review & evaluate agency training classes
- Periodically review & evaluate departmental onboarding process
- Compare evaluation scores between departments
- Compare evaluation scores with observations
CONSTANT EVOLUTION

- Understand your system is a dynamic organism and is not perfect
- Ensure production understands when specialized training is necessary
- Audit your temporaries to find out if safety training deficiencies exist & where they are
- Implement lessons learned from accidents & loss history
- Continue to develop your trainers
- Change your plan to implement good ideas or address problems

SAFETY PROCESS

- Include temporaries in your safety process – don’t exclude them
- Include temporary employees in your safety committee
- Safety perception surveys of the temporary workforce
- Safety audits of safe behavior, work practices, & conditions
- Regularly scheduled safety trainings
- Incentive programs
SUMMARY

- Safety is a joint venture between the agency and the host employer
- Address management perception of temporary workforce
- Identify the risks exposing your temporaries to injury
- Establish a training plan that addresses the identified risks
- Address potential training plan wreckers
- Be open to continuous development & improvement
- Create a safety mentoring system
- Use signage to supplement your training
- Include temporaries in your overall safety program
- Hold everyone accountable
  - Agency
  - Employee
  - Host Employer Trainers
  - Management