

# eplica ▶▶ Safety Lines

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We sometimes overlook the fact that good housekeeping is a key duty on the job, too.

The orderly arrangement of work areas is vital to the safety of all workers, regardless of whether they are involved with machines and tools or with appliances and furniture.

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## The Importance of Safety Inspections



Systematic evaluation of your safety and health situation is an important facet of your safety program. Don't wait for accidents to happen before you investigate and inspect. Safety and health consciousness tends to slip, and it's your job to be sure that doesn't happen. A well-prepared and well-executed safety audit/inspection program can make a substantial difference in accident prevention.

Most organizations with successful safety programs have well-organized safety audit programs.

Safety inspection tours are like preventive maintenance--every piece of equipment wears down and deteriorates over time, and those pieces of equipment have to be checked regularly. Similarly, employee work procedures fall into routines over time--some of them unsafe routines--and these practices need regular re-evaluation to make sure that safe work procedures are followed.

### Why should you perform audits and inspections?

- ▶▶ Spotlight unsafe conditions and equipment.
- ▶▶ Focus on unsafe work practices or behavior trends before they lead to injuries.
- ▶▶ Reveal the need for new safeguards.
- ▶▶ Involve many more employees in the safety program.
- ▶▶ Help sell the safety program within the organization, thereby enabling you to:
  - Re-evaluate the safety standards of the organization.
  - Compare safety results against safety plans.
  - Gauge the relative success of safety training efforts.

-- Anticipate problems in advance of any OSHA inspection.

**General inspections** are considered comprehensive reviews of all safety and industrial health exposures in a given area or even a complete factory.

**Special inspections** (sometimes called targeted inspections) deal with specific exposures in a given unit or section, or even plant-wide. Such an inspection might focus on electrical hazards in machinery used for manufacturing, or the hazards that may have generated back injuries as recorded in the OSHA 300 log or noticed during a review of workers' compensation reports. It could involve the branch's compliance with the OSHA Hazard Communication Standard and the development of a checklist for compliance with the principal elements of that standard.

A good inspection program can include both special and general type of inspections. For example, a program could involve a complete plant tour for safety hazards during one month; and in the next month, the program could focus on inspecting personal protective equipment and how it is used on the job. OSHA encourages such a mixed approach, believing that a combination of the two types of programs can strengthen a plant's accident-prevention effort.

### OSHA's Policy on Voluntary Self-Audits

OSHA has developed a policy describing the Agency's treatment of voluntary employer self-audits that assess workplace safety and health conditions, including compliance with the Occupational Safety and Health Act. The policy provides that the Agency will not routinely request self-audit reports at the initiation of an inspection, and will not use self-audit reports as a means of identifying hazards upon which to focus during an inspection. In addition, where a voluntary self-audit identifies a hazardous condition, and the employer has corrected the violative condition prior to the initiation of an inspection (or a related accident, illness, or injury that triggers the OSHA inspection) and has taken appropriate steps to prevent the recurrence of the condition, the Agency will refrain from issuing a citation, even if the violative condition existed within the six month

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## The Importance of Safety Inspections

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### April Safety Tip

We sometimes overlook the fact that good housekeeping is a key duty on the job, too.

The orderly arrangement of work areas is vital to the safety of all workers, regardless of whether they are involved with machines and tools or with appliances and furniture.

Falls often result from tripping over loose articles such as tools left in aisle ways and work areas.

Wet spots on the floor or trash and other articles left in stairways also take their toll. They can cause slips and falls. They should be cleaned up as soon as possible, regardless of who was responsible for the mess.

### Contact Us

Editor-in-Chief/Writer  
**CLAUDIA C. HARO**

Editorial Consultant/Writer  
**JEFF ADCOCK**

Staff Writer  
**APRIL FLAK**

Contact us:  
[allsafety@eplicaservices.com](mailto:allsafety@eplicaservices.com)

limitations period during which OSHA is authorized to issue citations. Where a voluntary self-audit identifies a hazardous condition, and the employer promptly undertakes appropriate measures to correct the violative condition and to provide interim employee protection, but has not completely corrected the violative condition when an OSHA inspection occurs, the Agency will treat the audit report as evidence of good faith, and not as evidence of a willful violation of the Act.

#### Who Should Conduct Safety Inspections?

In some manufacturing companies, the safety committee will take the lead in inspections. In other operating units, a rotating team of supervisors, perhaps with safety committee assistance, will head the task. Most experts, however, do recommend involving the supervisor or manager. This makes it clear that line management, not the safety department, has responsibility for safety.

Inspecting complex technological operations may require specialized skills, knowledge, training, or even certification. Such inspections should be conducted only by people knowledgeable about the department of operation.

#### Outsiders Can Be Helpful

Outsiders may also participate in your audits. Insurance company loss-control can be helpful by coming to inspect your premises and helping you with your safety audit. This is particularly true for organizations that involve hazardous occupations. In addition, sometimes the workers' compensation carrier will insist on plant tours from time to time to assess the safety program.

And then there is the OSHA specialist who arrives unannounced to check on your compliance with specific OSHA regulations. Even if there is not a specific regulation, the specialist may want to measure your organization against the OSHA General Duty Clause that requires employers to provide a safe workplace free from recognized hazards. However, most employers like to stay one jump ahead of OSHA with an effective local audit program, conducted by effectively trained inspectors using a carefully prepared general or specific checklist.

#### What Should You Inspect for?

Most inspection programs give leading attention to

hazardous conditions. That is the obvious focus of an inspection program--machinery, materials, environmental conditions, and the like that could cause injury.

Too often little attention is given to unsafe acts or hazardous behavior of employees, which is perhaps the leading cause of injuries in the United States today. This part of the inspection program should focus on such very basic items as new-employee safety orientation, specific training on the new job for the employee, supervisory follow-up, a review of the OSHA 300 log to highlight injuries and their causes, and, perhaps the most important part, the recommendation of improved, safe working procedures when causes have been determined.

#### How Often Should You Inspect?

Most safety inspection/audit programs feature a variety of inspections at varying times. Many in-plant programs call for a formal monthly safety tour. Other organizations focus on a weekly round by the safety committee. Outside inspectors may show up only annually or twice yearly, depending on their function.

These special inspection activities should be in addition to:

- Daily or shift start-up checks or inspections made by mechanics and operators on their machines.
- Regular, scheduled maintenance reviews made by mechanics on production equipment.
- Start-of-shift checks made by forklift operators or trailer truck drivers.

#### Should safety inspections be planned or should they be unannounced?

There are differing views on this subject. The planned inspection has the advantage of thoroughness, of a scheduled activity with the auditors focused on doing the job and doing it thoroughly. But word gets around the manufacturing floor that "the inspectors are coming." Employees try to show off their departments and equipment in the best fashion. Unsafe work practices may not be detected.

The unannounced inspection is most likely to find conditions and work practices in a normal, everyday mode of operation. Unsafe work practices are more likely to be observed and noted on an unannounced tour.

### April Safety Quote

"The only excuse for poor safety is poor planning."