

The Ultimate Guide to Audit and Inspection Programs (Part 2)

The Regulatory Audit

Compliance with state and local regulatory requirements

Examples of questions an auditor should ask:

- Are all employees trained properly?
- What are your safety policies, and are employees actually following them?
- Is any written compliance program in place?
- Have you conducted a hazard assessment?
- What is the condition of personal protective equipment?
- What are your chemical storage procedures?
- Do you have all required hazardous materials paperwork?
- What are your machine guarding (AKA Lockout/Tagout) procedures?
- What are your respiratory protection procedures?
- Are any fall hazards present in the workplace?
- What are your shipping, warehousing, and transportation procedures?
- Are sprinkler systems in good working order?
- Is all necessary safety signage in place?

When people think about safety audits, they tend to think about the statutory audits. Audits are the most reliable way to avoid the agency's hefty penalties — by uncovering compliance problems before they lead to violations.

Ensuring statutory compliance is only one function of a safety audit, but it's a great place to start. After all, statutory regulations encompass the foundation of an effective safety program. They're the bare minimum of what every employer should be doing to keep workers safe. That is to say...

Don't mistake a regulatory audit for a safety audit.

It's part of a safety audit, but it's not the whole shebang. It's typically just the first phase—the initial check for issues that would likely result in injuries, penalties, or both if not addressed as soon as possible.

Not sure what to expect during a regulatory audit? Here are a few things auditors are looking for:

During a regulatory audit, an auditor will look at a facility's training program, documentation, and hazard assessment protocols to ensure compliance with statutory rules and standards. Examples of questions include the following:

- Has every employee undergone basic health and safety training?
- Have employees completed required training?
- Is training tailored to each employee's position?
- Has everyone who needs to be certified to carry out a certain task (e.g. forklift operation) achieved necessary certification?
- Is training accurate and up-to-date?
- Are employees completing required refresher training?
- How do employees behave in the workplace?
- Are they performing their work safely, even when left unsupervised or when an auditor's not around?
- Does the facility have applicable written programs?
- Is the written program accurate and complete?
- Is the facility actually following what it says?
- Has a personal protective equipment hazard assessment been completed?
- When was it last evaluated?
- Have facility operations changed recently?
- If so, are there new hazards to be aware of?
- What are the workforce's current respiratory needs?
- Are there new chemicals on-site?
- Can employees access Safety Data Sheets?
- Do they know how to access them?
- Is a Lockout/Tagout program needed?
- If so, has it been implemented, and have employees been trained on it?
- Is all necessary LOTO equipment in place?
- Has the facility evaluated its fall hazards?
- Does anyone on staff ever work above 4 feet or near an unprotected edge?
- Is the equipment that employees use in good condition?
- Were required equipment inspections completed?

Environmental Compliance

In addition to looking out for workforce health and safety concerns, an auditor will check to see whether the facility is adhering to Environmental regulations:

- Does the facility generate hazardous waste?
- Are the generator status and owner information accurate?
- Are all of the hazardous waste manifests organized and kept on-site?
- Has the facility thought about its e-Manifesting needs in 2021?
- Does the facility require an air permit?
- If so, is it on file? Does it need to be updated?
- How many storage tanks are kept on-site?
- Do they need to be registered?
- Should the facility have a Spill Prevention Control and Countermeasure plan in place?
- How about a Storm water Pollution Prevention Plan?
- Are there hazardous chemicals stored on-site?
- If so, what chemicals and how many?
- Does the facility need a Tier II plan?
- If so, who is filing that with the state?
- Does AC recovery happen on-site?
- If so, are employees properly trained on it, and has all AC recovery equipment been registered?

Some regulatory audits address the entire facility while others are more department-specific. When it comes to shipping, warehousing, or transportation, for instance, an auditor will pay close attention to any Department of Transportation compliance issues:

- Are hazardous materials loaded and unloaded properly?
- Are hazardous materials shipped on-site?
- Are employees trained on regulations?
- Is the proper signage posted?
- Are shipment papers filled out accurately?

National Fire Protection standards may seem less significant than safety and environmental compliance, but it's certainly in a facility's best interest to prevent fires:

- Does the facility's on-site chemical storage require a hazardous materials permit, either from the state or local fire department? (Some fire departments require a hazardous materials inventory so they know what to expect if they have to respond to an emergency at the location.)

- Has the sprinkler system been inspected?
- Are any sprinkler heads obstructed?

These are only a handful of the kinds of questions an auditor will ask to keep your organization in compliance with workforce health and safety rules. They may seem granular, but as they say, the devil is in the details.

Keep in mind that regulatory compliance is only one function of a safety audit. Audits also serve to proactively reduce workforce safety risks and improve efficiency. In other words, an effective audit goes beyond just keeping the organization in line with the letter of the law. If you're only conducting audits to ensure compliance, you're missing critical opportunities to keep people safe and save money

The Facility Inspection

- Department-specific regulatory compliance
- Department-specific safety hazards
- Equipment and machinery
- Documents
- Employee behaviors

Examples of questions facility inspections should consider:

- What is the layout of your facilities?
- Are your ladders in good condition?
- How about your forklifts?
- Have you tested your alarms recently?
- Where are your eyewash stations?
- How about your fire extinguishers?
- What's the condition of walking and working surfaces?
- Does anything require maintenance?
- Are employees trained to use the tools they're using, and are they using their tools safely?
- How are employees performing their jobs?
- Do employees have any feedback about how to improve the EHS program?

Like any organizational initiative, the success of a workforce health and safety program comes down to people. A company can make a substantial investment in safety planning, management, software, and training, but it's all in vain if individual workers and teams don't follow through in their day-to-day jobs.

Similarly, a lack of cohesion can sink organization-wide safety efforts. If a certain facility or department—or even one person— isn't 100% on board with the safety program, the entire company is at risk. A single incident can result in serious injuries or loss of life, as well as 5- or 6-figure penalties and additional expenses.

This is why it's essential to regularly evaluate your workplace through facility inspections.

What are facility inspections?

A facility inspection serves as an in-the-weeds, department-by-department investigation of an organization's premises, teams, and workforce behaviors.

As with a regulatory audit, a facility inspection is one component of a comprehensive safety audit. The language can get somewhat ambiguous here—many people use the words “audit” and “inspection” interchangeably when referring to an assessment of an organization's physical location, controls, and workers. For the purposes of this section, we'll be referring to the practice as an “inspection,” as unlike a full audit, it's something an organization can perform on its own, without the aid of a third-party expert.

When an expert is brought in, facility inspections are usually the second phase of a safety audit. After evaluating overall compliance with safety and environmental, and other regulatory authorities, an auditor will drill down to look for more specific, targeted concerns.

Here are some things safety consultants do when conducting facility inspections:

Check Regulatory Compliance, Equipment, and Documentation

The same regulations don't apply to every department. Different teams perform different duties, use different tools, and have different levels of risk. Auditors must therefore know which rules cover which employees and check to make sure everyone is doing their specific job safely.

The same goes for equipment such as ladders, forklifts, alarms, eyewash stations, and so forth. Teams have their own equipment, but all tools and machines need to be functional, properly maintained, and used in accordance with workplace safety laws and standards.

Documentation and communication are pivotal here, particularly in terms of documenting equipment inspections. Documentation takes different forms. Some equipment has individual tags, making it easy to note the date on it and who inspected it. Other organizations may want a comprehensive list of all equipment like fire extinguishers, so they can make notes on the list rather than each individual extinguisher.

Most inspections are visual, but some will require an employee or auditor to move the equipment around and test it for good condition.

The frequency of these inspections differs as well. Some equipment needs to be inspected daily, some weekly, some monthly, and others annually. Some departments may have storage tanks and other on-site chemicals that have their own inspection schedules.

Again, you can manage most inspections in-house (which is the only feasible option for daily and weekly inspections), but it's important to periodically also conduct full, more rigorous examinations (i.e. audits) with the aid of a safety consultant or other outside professional.

Look for Department-Specific Hazards

Moving from department to department, an inspector or auditor should scan physical environments from top to bottom, considering questions such as the following:

- Are there spills or trip hazards to note?
- What kind of equipment are employees using?
- Is that equipment in good condition?
- Are employees trained to use the tools they're using, and are they using their tools safely?
- What hazards may exist in close proximity to an employee?
- Is the environment loud or distracting? (If something is bothering you while you're walking around and completing your inspection, it probably disturbs employees who spend a lot more time within that department.)
- What's the condition of walking and working surfaces?
- Are there any cracks or holes in the floor?
- Any damaged railing?
- Does anything require maintenance?

Focus on Employee Behaviors

Doing an inspection means plenty of moving around—walking, crouching, picking up and manipulating objects—but it also requires an auditor to pause, observe, listen, and reflect. A quick scan of an environment doesn't tell you everything. Before moving on to the next room or department, stand still for a few minutes and take note of what's going on. Don't only look at the tools; watch how people use them.

An inspector or auditor needs to ask questions and engage with employees. If you don't know how a tool works, ask people about it. Employees love talking about their jobs.

Ask workers if they have any safety issues or suggestions. Incorporating employee feedback will dramatically improve your safety program, as it makes people feel involved and invested, and improvements to the workplace benefit everyone. Plus, you just might gain some knowledge that a checklist couldn't give you. Never forget that a facility inspection also includes the people—and their behaviors—within the facility

Accident Investigation

- Workplace accidents
- Employee injuries
- Incident response
- Preventive measures
- Corrective measures
- What it covers

Workplace safety trends

Examples of questions an auditor should ask:

- How many safety accidents have occurred recently?
- What is the nature of those accidents?
- What are your accident response procedures?
- Which employee or employees are responsible for gathering the details, documenting accidents, and following up?
- Is there a standard, repeatable accident response process in place?
- Are accidents addressed and documented in a timely manner?
- Why are accidents happening?
- What are the root causes?
- What kinds of accidents occur most often?
- What are the costs of accidents in the workplace?
- What can be done to prevent accidents in the future?
- What organizational practices and operating procedures need to change?

It happens suddenly—without warning. You hear a crash, a grunt, a cry for help. An employee is lying on the ground, unconscious, surrounded by broken equipment.

What do you do next?

Are you prepared to respond and take all the proper investigative actions as quickly, safely, and efficiently as possible?

Don't wait until a scenario like the above occurs to find out. If you haven't fully developed and optimized your accident investigation strategy, the time to do it is now.

The world's safest and best-performing organizations know that the smartest way to minimize workforce risks is to standardize accident investigation procedures in advance—before anyone gets hurt. While these organizations work hard to keep their number of injuries and illnesses at zero, they're aware that accidents can happen regardless of circumstances and controls in place.

Accident investigations also serve an important role in audits and inspections. By determining and addressing the cause of an incident, you'll prevent further (and potentially more serious) incidents from happening in the future. You also might find gaps to close in your safety program—along with opportunities to better adapt your EHS procedures to the specific issues facing your organization

1. Determine Who's Responsible

For accident investigations to happen efficiently—or to happen at all—the organization needs to identify and communicate responsibility. Which employee or employees will conduct investigations? Who gathers the initial details? Who will be responsible for following up? Every member of the organization should know what to do and who to go to in the event that someone gets hurt.

2. Create an Accident Investigation Kit

Investigations can rarely wait. After all, evidence of accident conditions can disappear within moments following an incident. The key to timely response is a well-prepared accident investigation kit.

This kit should include all the materials you need to gather information about the incident, along with clear instructions for steps to take— preferably in a checklist format. A checklist helps ground the investigation and ensure consistency. This is particularly important during crisis situations, when adrenaline and emotions run high and people might not be able to think clearly.

Other items usually found in an accident investigation kit include...

- barricade tape ☒ accident signage
- a camera
- a tape measure or another measuring device
- personal protective equipment
- pens and reporting forms

- blank accident investigation forms

Store these items in a small box or another container in a convenient, visible location, so you can grab the kit quickly on the go

3. Evaluate the Root Cause

After you gather the evidence of an accident, you'll need to sit down and assess the incident to find out its root cause. This isn't about determining fault, necessarily, but about understanding why what happened, happened. If you're new to accident investigations, use some tried and true methods such as the fishbone diagram and the 5 whys.

Whatever approach you use, the goal is to determine why. Keep asking why until you get to the root cause. You might be surprised at what answers you stumble upon when asking why an employee wasn't wearing the necessary PPE, for instance, or why they were feeling rushed.

4. Make Necessary Changes

Once you get down to that root cause, the next step is to think about what changes may need to be made to prevent a similar accident in the future. What was the outcome of the incident? Does a job, activity, or standard operating procedure need to change? Do we need to retrain employees or stimulate a change in behavior?

In addition to looking at employee injuries, pay attention to property damage, malfunctioning vehicles and equipment, and other potential indicators that change is necessary. Look historically and holistically at patterns and trends to gain deeper insights into your risks and the efficacy of your EHS program.

This is perhaps the most important part of the accident investigation process. The information you collect truly matters because it may lead to an improvement.

To be continued in next issue

Readers may please note that D. L. Shah Trust brings out two e-journals on a fortnightly basis. These are mailed to those persons or institutions who are desirous of receiving them:

These two e-journals are:

1. Safety Info
2. Quality Info

If you or your friends or colleagues wish to receive these journals, you may send us an email requesting for the same. There is no charge for these journals. Our e-mail address is:

dlshahtrust@yahoo.co.in or haritaneja@hotmail.com or dlshahtrust@gmail.com

You can also access these journals on our website: www.dlshahtrust.org

Published by : D. L. Shah Trust,
Room No. 16, 1st Floor, Gool Mansion,
Homji Street, Mumbai 400 001
email: dlshahtrust@yahoo.co.in
Ph: 022-22672041
Subscription: Free on request
(soft copy only)

Edited by : Hari K Taneja, Trustee,
D. L. Shah Trust
email: dlshahtrust@gmail.com
Phone: 022-2309 6529
Subscription: Free on request
(soft copy only)