

# SAFETY OF THE FACELESS EMPLOYEE



# WHY USE TEMPORARY EMPLOYEES?

- ∞ 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 employees
- ∞ Special projects
- ∞ Reduce labor costs



**THESE PEOPLE MATTER TO YOUR COMPANY!**



UNDERSTAND  
YOUR HURDLES  
TO SUCCESS

# HURDLES TO OVERCOME

## ☞ Management attitudes

- “Warm Body Syndrome”
- Not invested & never will be invested in company
- Not my employee

## ☞ Language and literacy

## ☞ Transient workforce

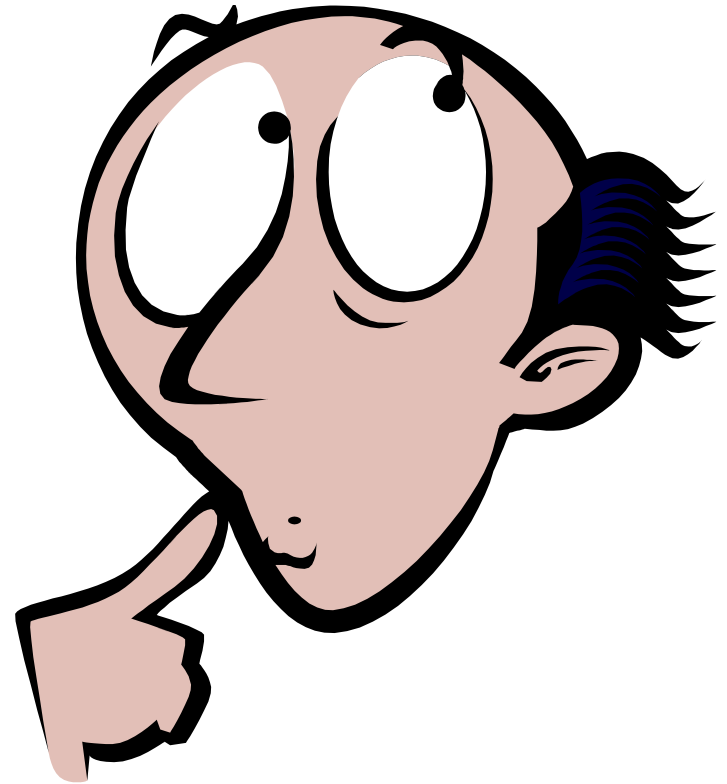
## ☞ Lack of time to train

## ☞ Not a company metric



# REALITIES OF SKEWED PERCEPTIONS

- ∞ Understand the focus of your management
  - What drives them?
    - Production, quality & delivery
    - Cost
    - Human element
  
- ∞ Focuses are constantly changing
  
- ∞ Management must understand how the safety of temporary employees benefits them



# WHAT'S IN IT FOR ME?

- ☞ Reduction in turnover
  - Improved & more consistent production, quality, & efficiency
- ☞ Reduction in costs
  - Time associated with training & investigating accidents
  - Agency mark ups (WC costs)
  - OT costs
- ☞ Increase in morale
  - People feel safe at work & helps instill a commitment with them
- ☞ Recruit & retain potential new hires from temporary workforce
  - Variety of reasons (i.e. lack of experience) may dictate temporary employment

# OSHA & TEMPORARY EMPLOYEES

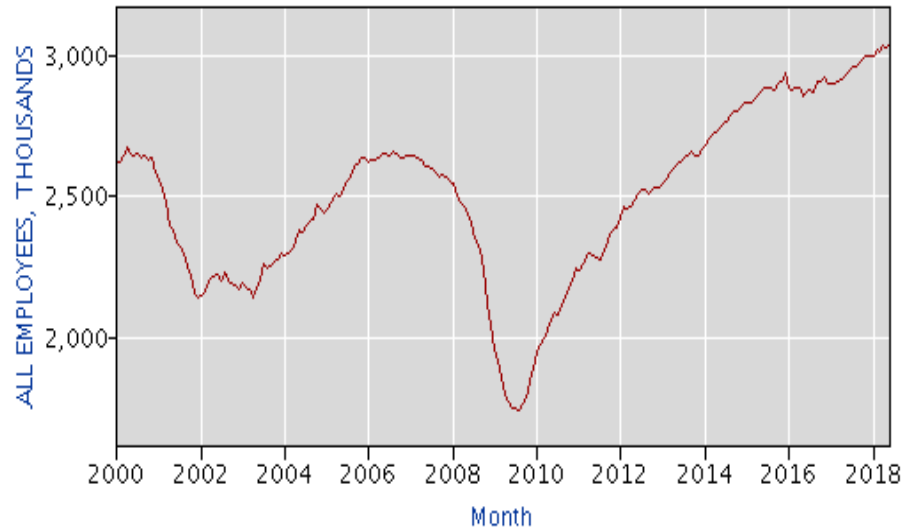
∞ 4/29/13 - OSHA launches TWI to protect temporary workers

∞ Initiative is very simple

- Agency & host considered “joint employers” of temporaries & both have responsibilities for protecting temporary employees
- CSHO must determine if both employers met their responsibilities
  - Contract review but contract may not discharge obligations
  - Obligations dependent on workplace conditions, contract, & whichever employer is best suited to assume primary responsibility for requirement
    - Host – Determining hazards & complying with worksite-specific requirements
    - Agency – Not sending employees to worksites with unprotected hazards or hazards on which employees have not been trained
- If temporary exposed to violative condition, OSHA will consider issuing citations to either or both employers depending on facts of case
  - Inquiry into agency’s actual or constructive knowledge of worksite hazards & whether agency knew, or with exercise of reasonable diligence, could have known about hazards
- Inspection of agency initiated if investigation indicates agency does not appear to have taken actions to learn of host worksite conditions

# TRUE STORY IS UNKNOWN

- ∞ True picture of the issue is not really known
  - Employment vs. injury rates
- ∞ 2016 BLS injury & illness rates:
  - All industries - 3.2
  - Private industry - 2.9
  - Employment services - 1.6
- ∞ True numbers buried on host employer 300 logs
  - 1904.31 – employees not on payroll recorded on host employer 300 log if supervised on day-to-day basis
- ∞ No differentiation between temporary & permanent injuries on 300 log or BLS surveys

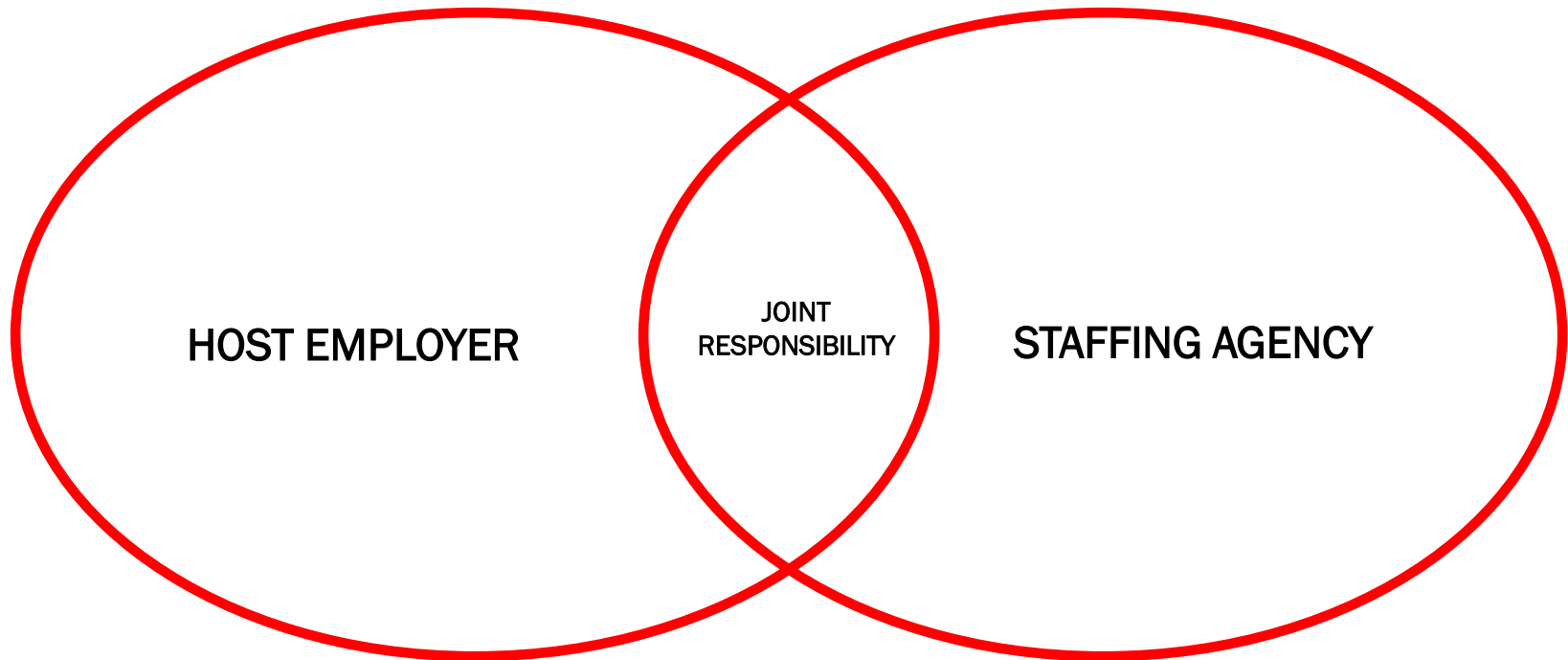


Temporary Help Services Industry  
Bureau of Labor Statistics Graph  
(<https://data.bls.gov/pdq/SurveyOutputServlet>)





# JOINT RESPONSIBILITY FOR SAFETY



# 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

- ∞ Ignorance is no longer an excuse because agencies have a duty to determine:
  - Working conditions (safety hazards & controls) at the host employer's work site;
  - If host is fulfilling its responsibility to provide a safe working environment; and
  - Ensure appropriate recordkeeping is performed
  
- ∞ Host employers should be evaluated for the following:
  - Loss history & OSHA inspection data
  - Job descriptions, JSA, & working conditions
  - Program establishment (i.e. hearing conservation, respiratory, etc.)
  - Prohibitive jobs (i.e. confined space entry, haz waste handling, etc.)
  
- ∞ Contracts should address the following at a minimum:
  - Who will train
  - PPE & program considerations (who is responsible for what)
  - Prohibitive jobs
  - Recordkeeping responsibilities



# JOB SURVEY & TRAINING NEEDS

- ∞ 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 for reference to ensure training consistency
- ∞ Use 300 log & accident reports to further identify 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

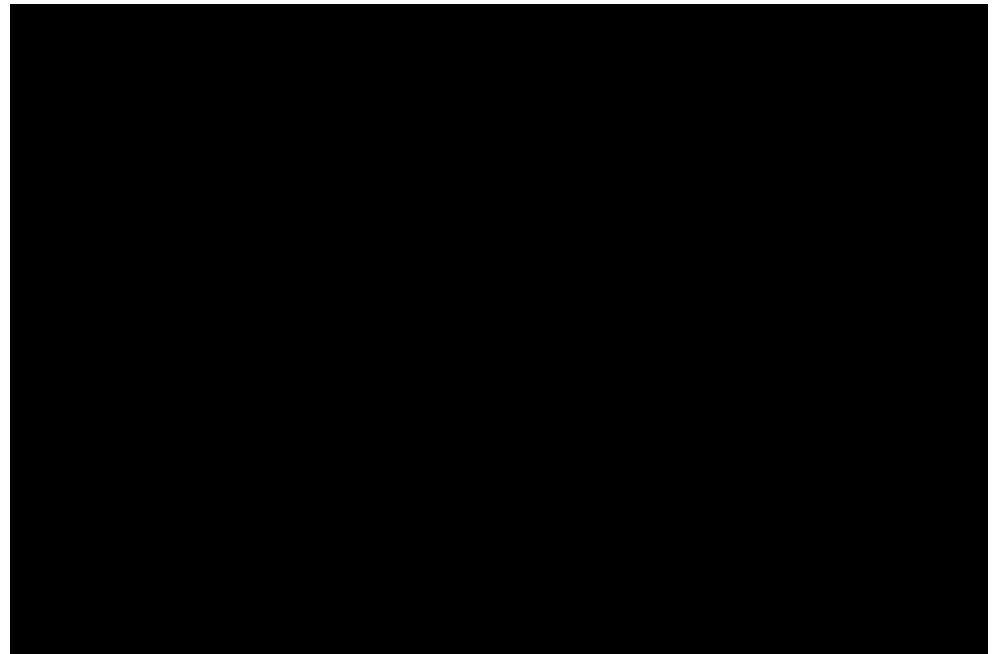


# MATRIX EXAMPLE

Department	Exposures	Training
Die Cast	<ul style="list-style-type: none"> <li>A. Molten metal &amp; Mg fines</li> <li>B. Repetitive motion &amp; lifting</li> <li>C. Powered industrial truck</li> <li>D. Fire &amp; explosion</li> <li>E. Sharp edges on parts</li> <li>F. High noise levels</li> <li>G. Heat</li> <li>H. CNC coolant &amp; die lube sump</li> <li>I. Machine operation</li> <li>J. Machine &amp; cell cleanup</li> <li>K. Confined space – no entry</li> </ul>	<ul style="list-style-type: none"> <li>A. Magnesium handling</li> <li>B. Ergonomics</li> <li>C. PIT</li> <li>D. Fire extinguisher &amp; ERP</li> <li>E. PPE</li> <li>F. Haz Com</li> <li>G. LOTO</li> <li>H. Machine operation</li> <li>I. Confined space - limited</li> </ul>
Bulk Feed	<ul style="list-style-type: none"> <li>A. Powered industrial truck</li> <li>B. High noise levels</li> <li>C. Plastic on floor</li> <li>D. Fire</li> <li>E. Grinder &amp; tilter operation</li> <li>F. Grinder blade changes – NA</li> </ul>	<ul style="list-style-type: none"> <li>A. PIT</li> <li>B. PPE</li> <li>C. Housekeeping</li> <li>D. Fire extinguisher &amp; ERP</li> <li>E. Haz Com</li> <li>F. Machine operation</li> </ul>

# WHY DO THEY PUT THEMSELVES IN HARM'S 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





TRAINING  
PLAN

AGENCY  
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SURVEY TO  
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# ESTABLISH A TRAINING PLAN

- ∞ Identify necessary training to allow your temporaries to perform their jobs safely
- ∞ Dual effort - define & agree who will provide what training
  - Agency – General safety training for your company
  - Host Employer – Department & equipment specific
- ∞ Establish set training documents to ensure consistency
  - Host company should champion training development – they know their processes
- ∞ Establish a system that evaluates understanding & ensures continued development
  - System should allow continued development of safety knowledge
  - Knowledge on day #1 vs. knowledge on day #30 expected to be different

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# AGENCY TRAINING

- ∞ Typically, generic & agency specific safety training
  - Accident reporting
  
- ∞ Should also include 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 & exposures
  
- ∞ Evaluate understanding prior to stepping foot on host employer's site

# EXCEPTS 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?



06.29.2006

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# HOST EMPLOYER TRAINING

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







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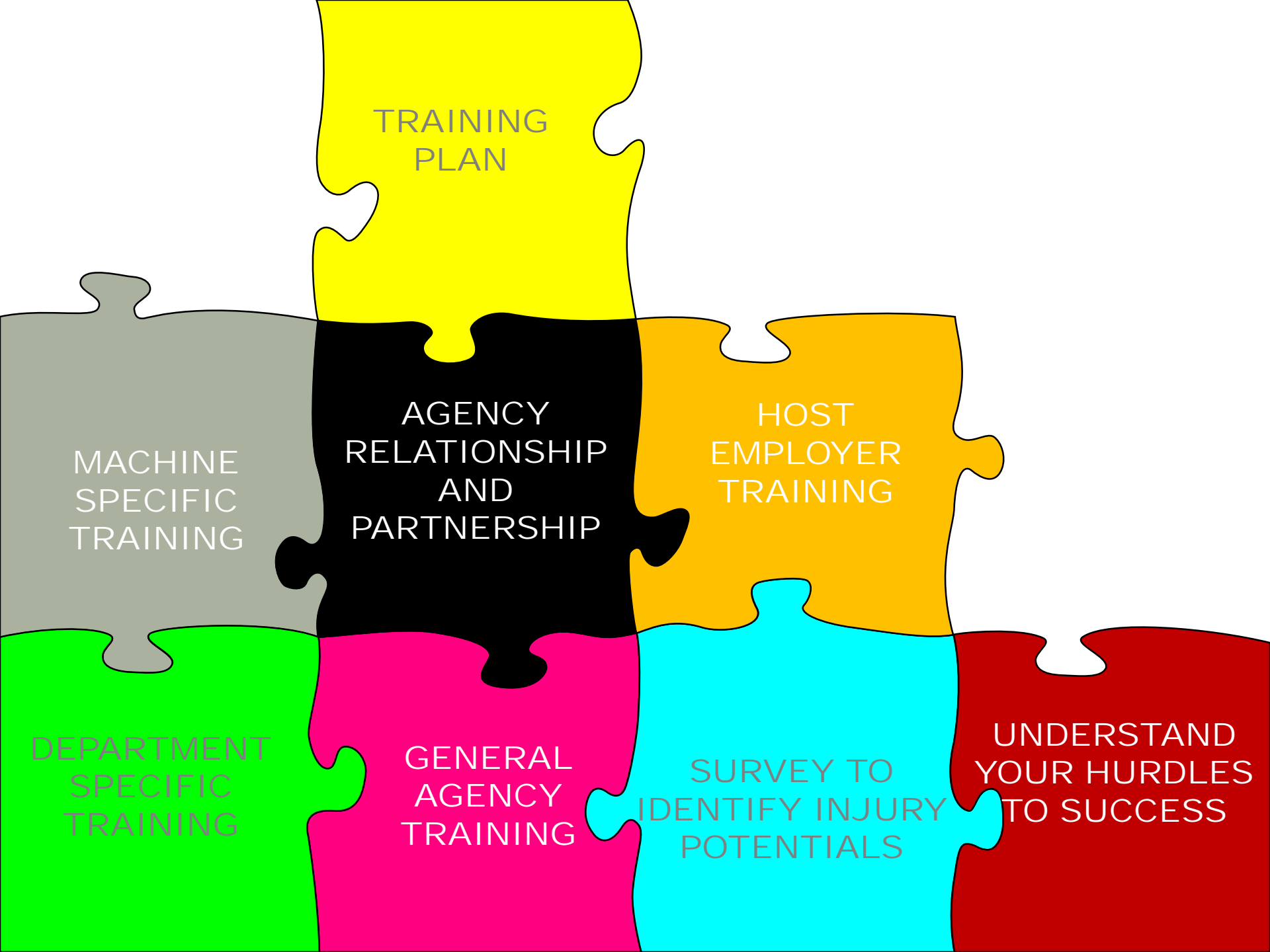
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# DEPARTMENT SPECIFIC TRAINING

- ∞ Very important since it involves the area in which the person will be working every day
- ∞ Goal is to train employees on the identified hazards & controls used to protect themselves from the hazards
- ∞ Cover such things as:
  - Hazards in the area
    - Forktruck traffic
  - Safe work procedures (JSA)
  - PPE
  - Emergency procedures
  - Housekeeping requirements





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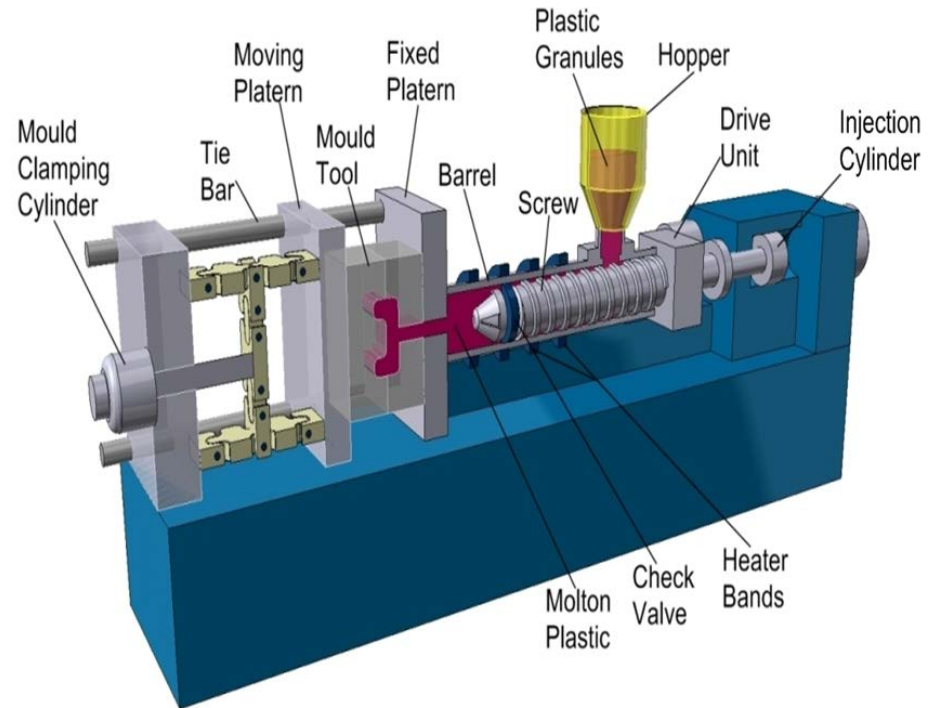
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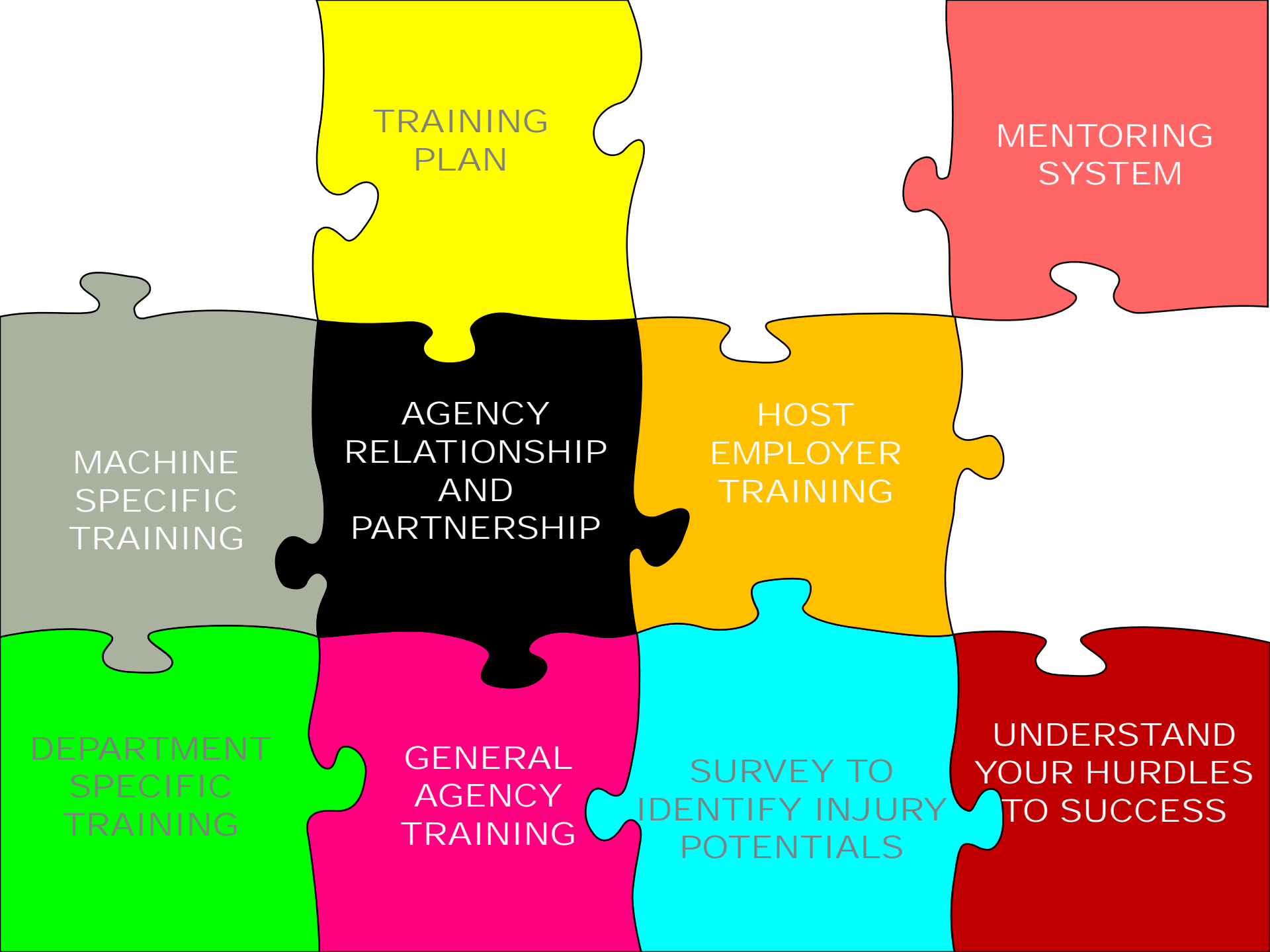
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# MACHINE SPECIFIC TRAINING

- ∞ 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





TRAINING  
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MENTORING  
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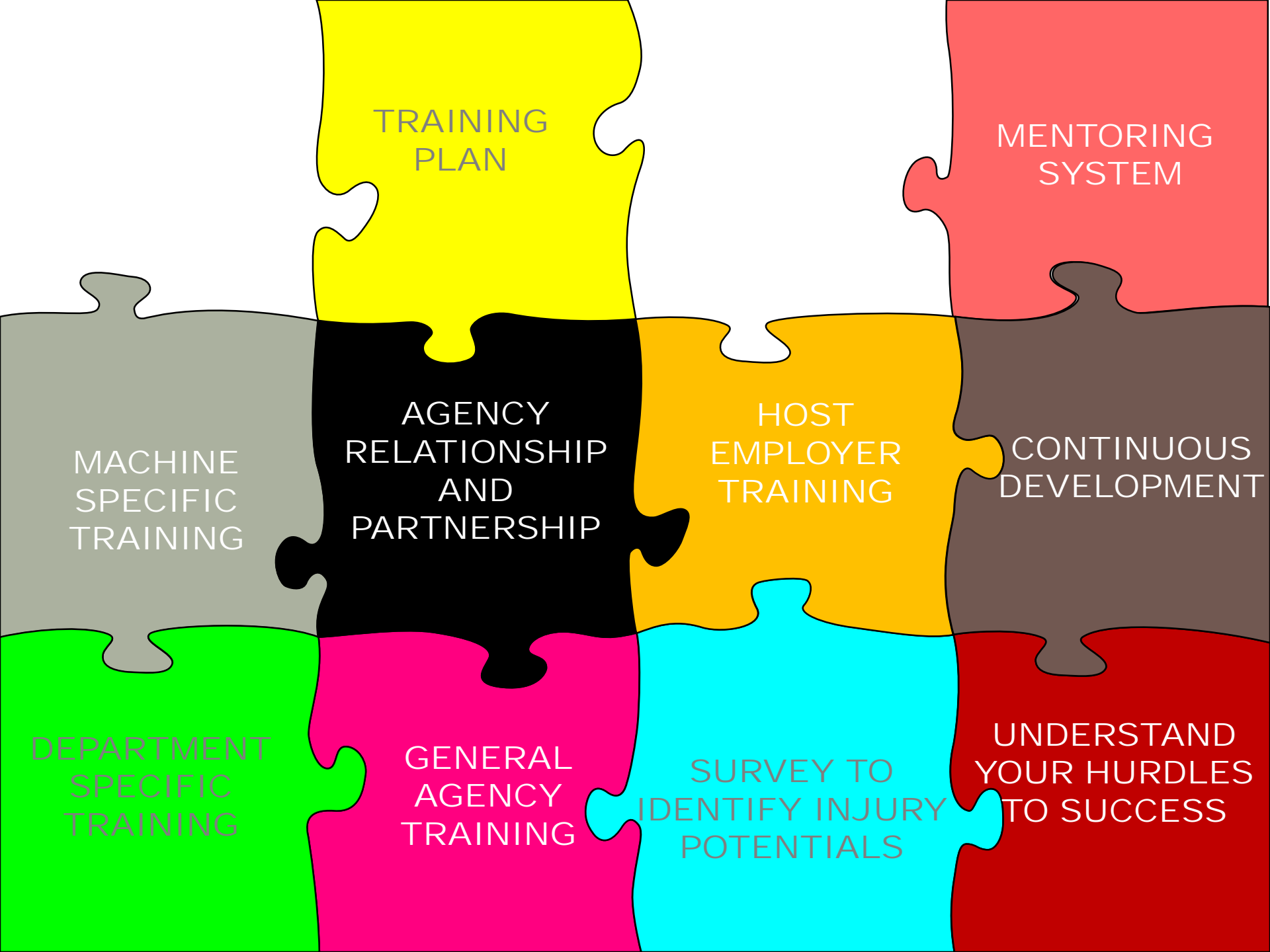
# SAFETY MENTORING SYSTEM

- ∞ 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



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# CONTINUOUS 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



PERIODIC  
EVALUATION

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# PERIODIC EVALUATION

- ∞ Periodically, agency & host employer should jointly evaluate the process to evaluate effectiveness
  - Review process from start to finish to identify gaps or issues
- ∞ Action plan(s) should be discussed & agreed upon between the agency & host employer if gaps or issues are identified
- ∞ Agency & host employer should hold each other accountable for what they agreed to do
  - Temporaries performing prohibitive jobs
  - Training timeliness
  - PPE/medical surveillance
- ∞ Decisions may need to be made if resolutions cannot be reached
  - Remove temporary from job or worksite
  - Risk OSHA fines

PERIODIC  
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# TRAINING PLAN WRECKERS

- ∞ Poor trainers & poor training techniques
  - “Here read this” method
  
- ∞ Language and literacy issues
  - Know demographics & translate important documents in advance
  - Pictures, pictures, pictures
  - Hands on training
  
- ∞ No established metrics
  - What level of safety knowledge must someone have to be safe in your facility?
  
- ∞ Production demands & lack of management commitment
  - What training is truly important?
  - Use shift overlaps & multiple trainers
  
- ∞ No checks & balances in the system
  - Review & evaluate agency & departmental onboarding processes



# 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

- ∞ Don't exclude them - Look for ways to include temporaries in your safety process
  - Regularly scheduled trainings
  - BBS observation system (observe them too)
  - Include in risk assessment activities if they are doing the job
  - Safety suggestion participation
  
- ∞ Establish mechanism for hazard reporting
  - Do temporary employees know how to access host employer safety representatives?
  
- ∞ Develop & analyze metrics
  - Separate injury & illness statistics between temporaries & permanent employees to acquire the real story & act accordingly
  
- ∞ Develop safety perception survey for temporary employees
  - Can also use with permanent new hires not hired through staffing agency

CONTINUOUS  
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# SUMMARY

- ☞ Safety is a joint venture between the agency and the host employer
- ☞ Must address management perception of temporary workforce
- ☞ Identify the risks exposing your temporaries to injury
- ☞ Establish a joint training plan that addresses the identified risks
- ☞ Address potential training plan wreckers
  - ☞ Identify & implement continuous development & improvement
  - ☞ Create a safety mentoring system
  - ☞ Periodically evaluate your plan
  - ☞ Look for ways to include temporaries in your overall safety program
  - ☞ Hold everyone accountable
    - Agency
    - Employee
    - Trainers
    - Management



# QUESTIONS

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