SAFETY OF THE FACELESS EMPLOYEE
THESE PEOPLE MATTER TO YOUR COMPANY!

- 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

WHY USE TEMPORARY EMPLOYEES?
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
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
Reduction in turnover
  o Improved & more consistent production, quality, & efficiency

Reduction in costs
  o Time associated with training & investigating accidents
  o Agency mark ups (WC costs)
  o OT costs

Increase in morale
  o People feel safe at work & helps instill a commitment with them

Recruit & retain potential new hires from temporary workforce
  o Variety of reasons (i.e. lack of experience) may dictate temporary employment
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 picture of the issue is not really known
  o Employment vs. injury rates

2016 BLS injury & illness rates:
  o All industries – 3.2
  o Private industry – 2.9
  o Employment services – 1.6

True numbers buried on host employer 300 logs
  o 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
UNDERSTAND YOUR HURDLES TO SUCCESS

AGENCY RELATIONSHIP AND PARTNERSHIP
JOINT RESPONSIBILITY FOR SAFETY

HOST EMPLOYER

JOINT RESPONSIBILITY

STAFFING AGENCY
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
Ignorance is no longer an excuse because agencies have a duty to determine:
  o Working conditions (safety hazards & controls) at the host employer’s work site;
  o If host is fulfilling its responsibility to provide a safe working environment; and
  o Ensure appropriate recordkeeping is performed

Host employers should be evaluated for the following:
  o Loss history & OSHA inspection data
  o Job descriptions, JSA, & working conditions
  o Program establishment (i.e. hearing conservation, respiratory, etc.)
  o Prohibitive jobs (i.e. confined space entry, haz waste handling, etc.)

Contracts should address the following at a minimum:
  o Who will train
  o PPE & program considerations (who is responsible for what)
  o Prohibitive jobs
  o Recordkeeping responsibilities
UNDERSTAND YOUR HURDLES TO SUCCESS

AGENCY RELATIONSHIP AND PARTNERSHIP

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

TRAINING PLAN

SURVEY TO IDENTIFY INJURY POTENTIALS

AGENCY RELATIONSHIP AND PARTNERSHIP
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
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
TOOLS

- “Use the right tool for the job and that it’s sized for the work at hand.”

- “Use the right ladder for the job at hand.”

- “Shield sharp blades and tool points.”

- “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.”

- “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

AGENCY RELATIONSHIP AND PARTNERSHIP

HOST EMPLOYER TRAINING

SURVEY TO IDENTIFY INJURY POTENTIALS

UNDERSTAND YOUR HURDLES TO SUCCESS
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)
UNDERSTAND
YOUR HURDLES
TO SUCCESS

GENERAL AGENCY TRAINING

SURVEY TO IDENTIFY INJURY POTENTIALS

HOST EMPLOYER TRAINING

AGENCY RELATIONSHIP AND PARTNERSHIP

TRAINING PLAN

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
UNDERSTAND YOUR HURDLES TO SUCCESS

GENERAL AGENCY TRAINING

SURVEY TO IDENTIFY INJURY POTENTIALS

HOST EMPLOYER TRAINING

AGENCY RELATIONSHIP AND PARTNERSHIP

MACHINE SPECIFIC TRAINING

DEPARTMENT SPECIFIC TRAINING

TRAINING PLAN
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.
UNDERSTAND YOUR HURDLES TO SUCCESS

GENERAL AGENCY TRAINING

SURVEY TO IDENTIFY INJURY POTENTIALS

HOST EMPLOYER TRAINING

MENTORING SYSTEM

DEPARTMENT SPECIFIC TRAINING

MACHINE SPECIFIC TRAINING

AGENCY RELATIONSHIP AND PARTNERSHIP

TRAINING PLAN
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

SURVEY TO IDENTIFY INJURY POTENTIALS

HOST EMPLOYER TRAINING

CONTINUOUS DEVELOPMENT

MACHINE SPECIFIC TRAINING

DEPARTMENT SPECIFIC TRAINING

MENTORING SYSTEM

AGENCY RELATIONSHIP AND PARTNERSHIP

TRAINING PLAN
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

UNDERSTAND YOUR HURDLES TO SUCCESS

GENERAL AGENCY TRAINING

SURVEY TO IDENTIFY INJURY POTENTIALS

TRAINING PLAN

MENTORING SYSTEM

HOST EMPLOYER TRAINING

CONTINUOUS DEVELOPMENT

DEPARTMENT SPECIFIC TRAINING

AGENCY RELATIONSHIP AND PARTNERSHIP

MACHINE SPECIFIC TRAINING
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 EVALUATION

TRAINING PLAN

UNDERSTAND WHAT CAN WRECK YOUR PLAN

MENTORING SYSTEM

MACHINE SPECIFIC TRAINING

AGENCY RELATIONSHIP AND PARTNERSHIP

HOST EMPLOYER TRAINING

CONTINUOUS DEVELOPMENT

DEPARTMENT SPECIFIC TRAINING

GENERAL AGENCY TRAINING

SURVEY TO IDENTIFY INJURY POTENTIALS

UNDERSTAND YOUR HURDLES TO SUCCESS
Poor trainers & poor training techniques
  o “Here read this” method

Language and literacy issues
  o Know demographics & translate important documents in advance
  o Pictures, pictures, pictures
  o Hands on training

No established metrics
  o What level of safety knowledge must someone have to be safe in your facility?

Production demands & lack of management commitment
  o What training is truly important?
  o Use shift overlaps & multiple trainers

No checks & balances in the system
  o Review & evaluate agency & departmental onboarding processes
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
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
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