

A Case for Documenting Worksite Safety Inspections

When considering the benefits, it doesn't make sense why some contractors still do not document safety inspections.

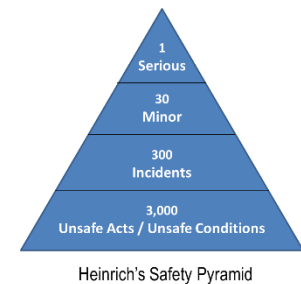
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OSHA mandates that workers should never be required to work under conditions that are dangerous to their health or safety. They further require that an employer's Injury and Illness Prevention Program must provide for "frequent and regular inspections of the job site" [reference 29 CFR 1926.20(b)(2)].

Contractors must ask themselves if they are properly completing OSHA required *frequent and regular inspections* of their respective jobsites. In my 13 years doing safety audits for numerous contractors, my observation is that it is surprisingly uncommon for contractor's to routinely schedule inspections, let alone document them. When asked, they will tell you that their foremen or superintendents visually inspect the work site daily, but they are not always being documented. A common quote among SH&E professionals is "if it ain't in writing, it ain't been done" certainly applies here. Documentation is important!

To understand why some contractors have not implemented a formal system to document safety inspections, it may be helpful to consider H.W. Heinrich's classic Safety Pyramid. Heinrich theorizes that for every serious accident, there are 29 minor accidents preceded by 300 incidents. If you expand this point a step further, one may reasonably conclude that for every 300 incidents there are 3,000 unsafe acts or unsafe conditions that occur in the workplace. It is well documented that the root cause of accidents, as much as 90 percent of more, is the result of "unsafe acts" not "unsafe conditions".

If true, this might explain why some contractors do not spend much time doing formal safety inspections with the purpose of identifying unsafe conditions. After all, if the majority of accidents are caused by unsafe acts, why waste time documenting unsafe conditions? Why not focus on behaviors, the real source of worker injuries?



Here is one reason; by eliminating unsafe conditions through frequent and regular safety audits we can minimize the opportunities for employees to perform unsafe acts. As an example, if an employee is trained on safe ladder use but falls from a ladder that slips out from under him because one of the non-skid pads is missing, isn't the root cause an "unsafe act", choosing to use that particular ladder? Or could it be that the ladder was not inspected in the first place? After all, if someone had inspected the ladder, it is possible that it would have been taken out of service and the employee would never have had an opportunity to perform the "unsafe act" (i.e. use the damaged ladder).

Consider if you will taking time to document all the things being doing right on the jobsite and not just the negative, as the case with most inspections. You might well find that your jobsites are more compliant than you think. I propose that many jobsites are 90 to 95 percent compliant, if not more, but we don't know this because many contractors do not take time to document it. In the example above, OSHA may issue a "Serious" citation for a defective ladder. Demonstrating a normally high rate of compliance with regards to ladder inspections will put you in a better position to defend yourself against OSHA and possibly get the citation reduced from Serious to Other-Than-Serious. At the very least, you can illustrate good faith in your efforts to comply and that fact alone has considerable merit.

When documenting safety inspections, management gains access to critical data for analyzing and trending safety compliance. New technology makes this easier than ever. There are several safety apps on the market that allow one to quickly and easily upload hundreds, if not thousands, of safety observations into a database for trending and analysis. By focusing our efforts on areas where we are most likely to see non-compliance, we can significantly reduce the odds of receiving an OSHA citation for something that could easily have been prevented.

Furthermore, tracking safety observations provides solid statistical data to share with our job crews to help drive safety improvement. Considering the data shown in Table 1, one can see that Electrical Safety compliance needs

improvement having an overall percent positive score of just 83 percent. With something as critical as electrical safety, compliance must be much closer to 100%.

Further analysis of this data allows us to identify areas within Electrical Safety that are in most need of attention:

- 1) Path to ground permanent and continuous (77% positive)
- 2) Worn/frayed extension cords not used (76% positive)
- 3) Breakers/switches legibly marked to indicate purpose (70% positive)
- 4) Cords protected/kept clear of work areas or walkways (66% positive)

Table 1

ELECTRICAL SAFETY	Pos	Neg	Total	% Positive
Equipment installed/used as listed or labeled? (1926.403)	63	5	68	93%
Path to ground permanent and continuous? (1926.403)	103	30	133	77%
GFCI on 120V, single-phase, 15/20 amp receptacle outlets? (1926.404)	75	12	87	86%
Flexible cords continuous/without splice or tap? (1926.404)	53	5	58	91%
Worn/frayed extension cords not used? (1926.416)	87	27	114	76%
Light bulbs protected from accidental contact/breakage? (1926.405)	56	8	64	88%
Temporary lights not suspended by electric cords? (1926.405)	59	5	64	92%
Worn/frayed extension cords not used? (1926.416)	47	20	67	70%
Cords protected/kept clear of work areas or walkways? (1926.416)	37	19	56	66%
Employees not allowed to work near unprotected circuits? (1926.416)	66	5	71	93%
Deenergized circuits tagged out? (1926.417)	14	1	15	93%
Access to electrical rooms limited/restricted? (1926.416)	19	3	22	86%
Electrical panels/circuits fully enclosed? (1926.405)	71	10	81	88%
Category Total	750	150	900	83%

Tracking safety observations provides the metrics to establish safety goals. Using the data in the table below, one might set a goal, for example, of achieving 90 percent or higher in each Inspection Category. In reviewing the data for 2019 shown in Table 2, it appears certain areas need further oversight in order to reach this goal.

If the goal is to achieve a safety score of 90 percent or better in all inspection categories, added emphasis in the way of improved safety training and/or management oversight may be needed to address the deficiencies in the highlighted areas:

- Concrete/Masonry
- Electrical Safety
- Fire Safety
- Hazard Communication
- PPE

Table 2

TOTAL OBSERVATIONS (2019)	Pos	Neg	Total	%
Aerial Lifts	438	34	472	93%
Concrete/Masonry	59	8	67	88%
Confined Space	12	0	12	100%
Cranes/Rigging	255	20	275	93%
Electrical Safety	750	150	900	83%
Fall Protection	191	16	207	92%
Fire Safety	185	22	207	89%
Housekeeping	292	29	321	91%
Ladders/Stairs	473	11	484	98%
Medical/FA Services	112	9	121	93%
MSDS/HazCom	317	57	374	85%
PPE	882	159	1041	85%
Postings/Safety Signs	130	12	142	92%
Safety Training	539	59	598	90%
Sanitation	112	12	124	90%
Scaffolds (Supported)	337	32	369	91%
Tools (Hand & Power)	677	40	717	94%
Trenching/Excavation	302	25	327	92%
Welding & Cutting	226	25	251	90%
Total	6289	720	7009	90%

One last point to consider, data obtained through safety inspections can be used as part of a supervisors annual Safety Performance Review or it can be used to distribute safety bonuses. Consider how much simpler and equitable it would be to use data like that shown below when evaluating a supervisors' safety performance or distributing safety bonuses?

Foreman Safety Scores

Foreman A - 87%

Foreman B – 92%

Foreman C – 79%

Using these numbers as an example, a contractor would distribute the maximum safety bonus allowed to Foreman B who achieved a safety score of 90 percent or better throughout the year. Less money would be distributed to Foreman A for achieving an 80 to 89 percent safety score and even less money, or no money, would go to Foreman C who scored less than 80 percent.

In summary, there are numerous benefits to be gained when documenting jobsite inspections:

- 1) Minimize unsafe conditions reducing the opportunity for workers to perform unsafe acts
- 2) Build a strong OSHA defense when “positive” observations are documented
- 3) Improve compliance and reduce the chance of receiving an OSHA citation
- 4) Drive continuous safety improvement when data is analyzed and trended
- 5) Use solid metrics to develop safety goals and improve supervisor performance
- 6) Conduct objective Safety Performance Reviews to distribute safety bonuses equitably

When considering the risk of injury or illness to your employees, the cost associated with injuries and illnesses, not to mention increased exposure to litigation from not practicing your due-diligence, it just makes sense to document your inspections and analyze the data to implement safety improvements!

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