

# Evaluation of a Subcontractor Safety Program

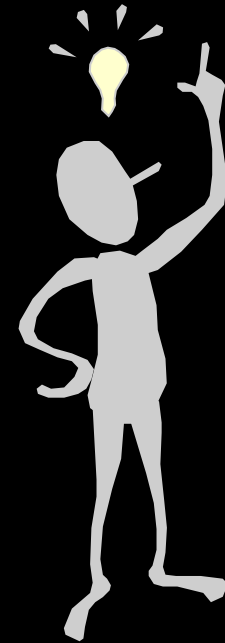


# Evaluation Requirement

Subcontractor safety programs shall be evaluated for effectiveness

The evaluation process

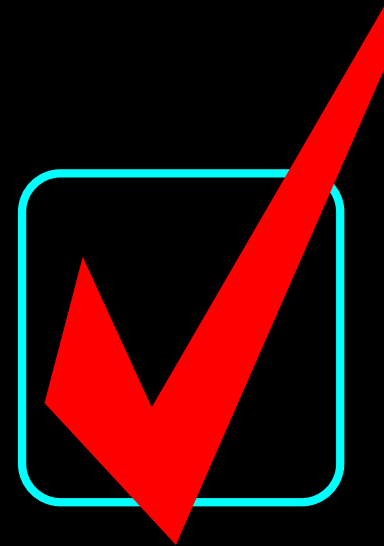
- Is continuous*
- Can be self-performed*
- Must be concise*



# Evaluation Requirement

The evaluation process is necessary for

- Accident prevention*
- Federal, State compliance*
- Contractual issues*
- Program enhancement*



# Evaluation Requirement

The correlation of feedback and accountability is reciprocal

- Feedback necessitates accountability*
- Accountability necessitates feedback*



# Analyzing Documentation

Analyzing data (documentation)

- Accident and incident reports*
- OSHA 300 logs*
- Regulatory fines*
- Safety violations*



Safety  
Violations

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# Analyzing Documentation

## Suggestion protocol

- Boxes*
- Safety meeting*
- Team leaders*
- One on one interviews*



# Safety Audit

What is a safety audit?

A systematic independent review to verify conformance with established guidelines or standards. It employs a well-defined review process to ensure consistence and to allow the auditor to reach defensible conclusions.

# Safety Audit

## Objectives of a safety audit

-Locate deficiencies

*Unsafe behaviors*

*Malfunctioning equipment*

*Hazardous chemicals*

*Physical impairments*



# Safety Audit

## Objectives of a safety audit

-Evaluate new processes or work tasks

*Change in physical movement*

*New equipment in use*

*Work area hazards*

*Noise conditions*

# Safety Audit

## Objectives of a safety audit

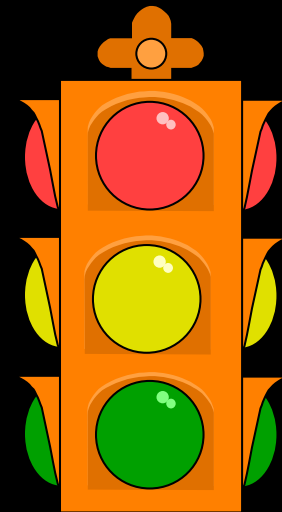
-Detect preparedness for emergencies

*Emergency action plan*

*First-aid*

*Fire protection*

*Weather conditions*



# Safety Audit

## Elements of a safety audit

- Random time approach

*Audits must take place inconspicuously*

*Consistency is imperative*

# Safety Audit

## Elements of a safety audit

### -Worksite walk-through

*Comprehensive approach to audit*

*Consistency is imperative*

# Safety Audit

## Elements of a safety audit

-Documentation

*Adequate, needs assistance*

*Scoring*



Safety  
Audit

# Safety Audit

Identify issues that may warrant attention

## -Housekeeping

*Messy work areas*

*Slip/trip hazards*

## -PPE

*Workers not wearing hard hats*

*Workers not wearing safety glasses (while saw cutting)*

# Safety Audit

Identify issues that may warrant attention

-Back (lifting) hazards

*Workers lifting heavy materials*

*Slip/trip hazards*

-Fire and/or hazardous chemicals

*No fire extinguishers available*

*Missing MSDS*



# Safety Audit

Identify issues that may warrant attention

-OSHA infractions

*No first aid kit available*

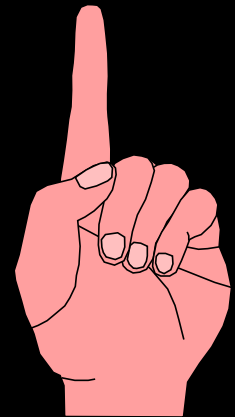
*Improper training*

-Any other hazard

*Weather issues (lightning)*

# Hazard Control

Once the evaluation process has been initiated, new methods of hazard control must be incorporated.



# Hazard Control

-Elements of control

*Engineering*

*Work place practice*

*PPE*



# Hazard Control

## Example

*During an audit, it was noted that a worker was using a plasma cutter bare-handed. His hands were getting very close to the flame while cutting metal.*

## Hazard control method

*Incorporation of a new PPE rule. Workers shall wear gloves when using the plasma cutter.*

# Effective Communication

## -Management-subcontractor

*Subcontractor deficiencies (written and verbal)*

*New control methods*

*Audit reports*

*Safety committee information*

# Effective Communication

-Management-employee

*Audit outcomes*

*One on one interviews*

*Safety committee information*

*Safety meeting material*



# Effective Communication

## -Time-frame management

*Setting guidelines for compliance*

*Scheduling applicable safety elements:*

- Toolbox meetings
- Safety committee meetings
- Audit reports

*Setting time-frame goals for compliance*