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# SHORT SERVICE EMPLOYEE PROGRAM

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**SHORT SERVICE EMPLOYEE PROGRAM**

## PURPOSE

This program is intended to help employers keep new employees, whether experienced or inexperienced, safe and on the job. Employers should adapt the program to fit their unique needs.

## IMPORTANCE

During the past decade, newly assigned employees in the Industrial and Construction Industry suffered the highest rates of fatalities and catastrophic injuries.

Approximately 65% of fatalities occurred within the first year of service. About 34% of fatalities occurred within the first three months of a new assignment!

There is clearly an urgent need and opportunity for employers to address this problem and safeguard newly hired workers. The following information will help you create a Short Service Employee Program or improve an existing program.

## SCOPE

This procedure applies to all company facilities and worksites. It is important to ensure that newly placed employees work under the direction of experienced personnel.

Short Service Employees should make up no more than 50% of a single crew at one time.. Further, a crew of 5 employees or less should include no more than one Short Service Employee at a time. Subcontractors should be included in this program.

A Short Service Employee (SSE) should be under this program for at least six months and until the SSE demonstrates the knowledge and skills necessary to perform their tasks safely.

## DEFINITIONS

*Mentoring* - a process of transferring skills and knowledge from one person to another in a work environment.

*Supervisor* – The individual responsible for the direct supervision and oversight of an employee.

*Short Service Employee (SSE)* – A newly placed full-time or temporary employee or subcontractor with less than six months’ experience in assigned job.

*Short Service Employee Mentor*-Person with at least 6 months’ employment with the company who has demonstrated safe and efficient work habits.

## 

## MANAGEMENT RESPONSIBILITIES

The responsibilities of company leadership and management are to set expectations, evaluate effectiveness and:

* Make and demonstrate a personal commitment to a strong and functional Health Safety and Environmental work culture,
* Establish a written, signed and dated HSE policy that sets compliance expectations for management and employees,
* Provide employees access to company policies, standards and procedures,
* Establish written HSE Orientation and Short Service Employee Programs for all employees newly assigned to any job or task,
* Ensure that all employees new to a job assignment are identified to the responsible supervisor(s) and placed into the HSE Orientation and Short Service Employee Programs, and
* Audit, review performance and take timely corrective actions to continually improve the effectiveness of the orientation and Short Service Employee Programs.

## SUPERVISOR RESPONSIBILITIES

The responsibilities of Supervisors in the Short Service Employee Program are:

* Know which jobs and crews are using Short Service Employees,
* Ensure Short Service Employees are appropriately identified per this plan,
* Develop and communicate Job Safety Analyses (jsas) to affected personnel upon initial assignment and when the operation changes,
* Ensure Short Service Employee Mentor possesses proper knowledge and skills in the job task assigned,
* Ensure Short Service Employee Mentor is adequately training SSE,
* Ensure Short Service Employee is gaining the necessary knowledge and skills in the job tasks, and
* Follow all safety rules and company policies.

## MENTOR RESPONSIBILITIES

The responsibilities of the Mentor in the Short Service Employee Program are to:

* Be an experienced and responsible person assigned by the supervisor to work with the new employee,
* Be selected based on a history of safe work and policy/procedural knowledge,
* Be able to communicate the expectations and characteristics of work tasks and their associated hazards,
* Have a patient disposition, as well as the desire and willingness to devote the necessary time to succeed as a mentor,
* Possess knowledge and skills in the job tasks assigned to the sse,
* Be willing and able to effectively listen to the sse to determine if the sse is learning and retaining the knowledge being shared,
* Be willing to watch a sse perform a job without interfering as long as the sse is not in a position to harm themselves, others, the environment or the equipment,
* Adopt a positive safety attitude, avoid criticism, and strive to build confidence and self-esteem in the sse,
* Be able to teach the SSE the proper way to create a quality JSA and to follow that JSA in performing tasks,
* Keep abreast of new equipment in their field of expertise,
* Refrain from taking shortcuts and doing anything else that jeopardizes health or safety,
* Demonstrate a positive work ethic at all times, and
* Introduce the SSE Checklist (Appendix B) to the new employee. The checklist is a tool to train the new employee and monitor progress,
* Review the checklist with the new employee periodically over a six-month period, and forward the information for supervisor and management review, and
* Follow all company policies and procedures.

## 

## SHORT SERVICE EMPLOYEE RESPONSIBILITIES

The responsibilities of the Short Service Employee are to:

* Be willing to watch and listen to the Mentor,
* Establish a positive safety attitude toward assigned job tasks,
* Learn how to create and follow jsas,
* Be willing to learn how to do each task in a safe and environmentally sound manner,
* Stop and report unsafe conditions immediately,
* Participate in safety meetings, and
* Follow all safety rules and company policies.

## HSE COORDINATOR RESPONSIBILITIES

The responsibilities of the HSE Coordinator in the Short Service Employee Program are to:

* Serve as subject matter resource to support the Supervisor and SSE
* Ensure the SSE gets the necessary safety training,and
* Follow all policies and procedures.

## PROCEDURES - SHORT SERVICE EMPLOYEE PROGRAM.

### **Notification (Appendix A)**

The HR department notifies worksite management/supervision and safety department of all newly hired or reassigned employees. In turn, Management will notify the Safety Coordinator of new employees in their region who require training.

### **Orientation**

* Management will provide a company-approved orientation. The orientation will include a Job Orientation Checklist (Appendix C) that the supervisor reviews with each newly hired employee.
* Each SSE will be provided orientation specifically based on job position and job-related topics prior to performing job tasks.
* Each SSE will be taught how to access company policies, standards and procedures.
* Satisfactory completion of the orientation must be signed and dated by the employee and supervisor.

### **Training**

The supervisor will ensure that each SSE is properly trained per federal, state, industry, company and operator requirements before starting work when:

* The employee is hired;
* The employee is appointed a new job assignment; and
* The employee is exposed to new substances, processes, procedures, equipment, etc that represent a new hazard to the employee.

**The supervisor will ensure that each SSE is properly trained in:**

* The hazard(s) present in the workplace;
* The policies, procedures, processes and ppe utilized to control these hazards and prevent illnesses, injuries, property damage and/or environmental incidents; and
* The skills necessary to conduct their assigned jobs safely and efficiently while providing quality and economy.

### **Identification System**

It is important for supervisors, co-workers and project managers to recognize a Short Service Employee; therefore, an identification system is developed for this purpose. The identification system is a means of communicating to the workforce that the Short Service Employee is in a transitional period. It will not be a designation of in-experience or used to mark an employee as having lower skill sets.

The SSE will be identified by a vest, colored hardhat, decal or other clothing or PPE that prominently identifies the employee as a SSE employee. For example, if a hardhat decal is used, it should be placed on each side of the hardhat with a label under the decal indicating the date when the employee is no longer considered to be a Short Service Employee. The Supervisor and the SSE Mentor will provide supervision and not allow the SSE to perform any task in which they have not been properly trained. The Supervisor and the SSE Mentor will ensure that the SSE understands the task to be performed and the associated hazards.

The Supervisor removes the decals and other identifiers upon expiration of the SSE term, and after verifying that the SSE exhibits a knowledge and skill level to perform the job tasks assigned.

## DOCUMENTATION

The HR Specialist completes the SSE Notification form for new employees (Appendix A) and forwards to the Supervisor.

Upon completion of training, supervisor signs off and forwards notification form to HR.

All records for the SSE Orientation and Training should be maintained at the employee’s location by the Supervisor.

## 

## SSE QUALITY ASSESSMENT AND CONTROL

* Management should review the effectiveness and quality of the Short Service Employee Program at least annually.
* SSE Orientation and Training documentation should be audited for accuracy, timeliness and completeness.
* Onsite inspections should be conducted to ensure that supervisors, mentors and Short Service Employees are adhering to the SSE Program.
* The number of incidents involving new employees should be measured, compared to the general workforce and evaluated for trends or performance variations.
* Management should ensure that all program deficiencies are promptly corrected and documented.

**Appendix A**

**COMPANY SHORT SERVICE EMPLOYEE NOTIFICATION FORM**

* Short Service Employee Information (completed by HR Specialist)

|  |  |
| --- | --- |
| Employee Name (Print) |  |
| * Employee Hire Date | Change Date: |
| * Current Job Title |  |
| * Time in Present Position |  |
| * Years of Experience |  |
| * Types of Experience |  |

SSE Mentor Information (completed by Supervisor)

|  |  |
| --- | --- |
| Employee Name (Print) |  |
| Employee Hire Date |  |
| Current Job Title |  |
| Time in Present Position |  |
| Years of Experience |  |
| Types of Experience |  |

Supervisor Sign-Off (Send to Project Manager)

|  |  |  |
| --- | --- | --- |
| Print Name: | Print Job Title: | Signature: |

Send to Safety and HR Directors and retain in employee’s files.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Employee has received the required  Safety Orientation | Yes |  | No |  |
| Employee has received all required  Safety Training \* | Yes |  | No |  |
| Employee has received the required safety training except (Attach list of any exceptions) | Yes |  | No |  |

\* Safety training shall be determined and conducted by individual company policies and procedures, in compliance with all regulatory requirements.

* **Appendix B**
* **Short Service Employee Check List**

|  |  |  |
| --- | --- | --- |
| Mentor’s Initials as Completed | SSE  Initials as Completed | Short Service Employee sets clear expectations and consequences for safe behaviors. |
|  |  | Does not take unnecessary risks. |
|  |  | Asks for help when needed. |
|  |  | Does not try to lift or handle too heavy of a load. Gets mechanical help when needed. |
|  |  | Raises awareness of possible hazards. |
|  |  | Intervenes with unsafe behaviors. |
|  |  | Understands his/her “stop work” authority and responsibility |
|  |  | Short Service Employee demonstrates ability to do job required: |
|  |  | Works in a craftsman-like manner. |
|  |  | Has clear understanding of job to be done. |
|  |  | The new employee can use tools safely by: |
|  |  | Communicating |
|  |  | Demonstrating |
|  |  | Observing |
|  |  | New Employee is able to identify the following at the work site: |
|  |  | Struck by hazards |
|  |  | Crushed by hazards |
|  |  | Burns and scalds |
|  |  | Sharp objects and precautions |
|  |  | Trip hazards and precautions |
|  |  | Electrical hazards and precautions |
|  |  | Fall hazards and precautions |
|  |  | Hot and / or cold surfaces, piping and equipment |
|  |  | Chemical hazards and precautions |
|  |  | Emergency procedures |
|  |  | Emergency communications |
|  |  | Respiratory hazards and precautions |
|  |  | Toxic substance hazards and precautions |
|  |  | Any additional hazards specific to the job site |
|  |  | Short Service Employee exhibits compliance to: |
|  |  | General safety rules and policies |
|  |  | Safety rules and policies specific to the job being performed |
|  |  | Housekeeping policies |
|  |  | PPE requirements |
|  |  | Short Service Employee shows competency on following equipment: |
|  |  | 1. Equipment Name: |
|  |  | 1. Equipment Name: |
|  |  | 1. Equipment Name: |
|  |  | **Other:** |

**\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

Mentor New Employee

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Today’s Date New Hire Date

Review Dates:30 day review\_\_\_\_\_\_\_\_\_\_ 60 day review\_\_\_\_\_\_\_\_\_ 90 day review\_\_\_\_\_\_\_\_\_

120 day review\_\_\_\_\_\_\_\_\_\_ 150 day review\_\_\_\_\_\_\_\_\_\_ 180 day review\_\_\_\_\_\_\_\_\_\_\_

DIST: Site Supervision - original Project File – copy Safety Dept. - copy

**Appendix C**

**Job Orientation Guide**

|  |  |  |  |
| --- | --- | --- | --- |
| Company: | *(Enter your Company Name)* | Employee: | *(Enter Employee Name* |
| Trainer: | *(Enter Name of Trainer)* | Hire Date: | *(Enter Employee's Hire Date)* |
| Date | *(Enter Date of Orientation)* | Position: | *(Enter Employee's Job Title)* |
|  |  |  |  |

This checklist is a guideline for conducting employee safety orientations for employees new to *(Customize by adding the name of your company)*. Once completed and signed by the supervisor and employee, it serves as documentation that orientation has taken place.

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
|  |  | | |  | Date | Initials |
| 1. | Explain the company safety program, including: | | | |  |  |
|  |  | | Orientation | | \_\_\_\_\_\_ | \_\_\_\_\_\_ |
|  |  | | On-the-job training | | \_\_\_\_\_\_ | \_\_\_\_\_\_ |
|  |  | | Safety meetings | | \_\_\_\_\_\_ | \_\_\_\_\_\_ |
|  |  | | Accident investigation | | \_\_\_\_\_\_ | \_\_\_\_\_\_ |
|  |  | | Disciplinary action | | \_\_\_\_\_\_ | \_\_\_\_\_\_ |
| 2. | Use and care of personal protective equipment, (e.g., hard hat, fall protection, eye protection, foot protection, FRC, etc.) | | | | \_\_\_\_\_\_ | \_\_\_\_\_\_ |
| 3. | Line of communication and responsibility for immediately reporting accidents. | | | |  |  |
|  | A. | When to report an injury | | | \_\_\_\_\_\_ | \_\_\_\_\_\_ |
|  | B. | How to report an injury | | | \_\_\_\_\_\_ | \_\_\_\_\_\_ |
|  | C. | Who to report an injury to | | | \_\_\_\_\_\_ | \_\_\_\_\_\_ |
|  | D. | Filling out accident report forms | | | \_\_\_\_\_\_ | \_\_\_\_\_\_ |
| 4. | General overview of operation, procedures, methods and hazards as they relate to the specific job | | | | \_\_\_\_\_\_ | \_\_\_\_\_\_ |
| 5. | Pertinent safety rules of the company | | | | \_\_\_\_\_\_ | \_\_\_\_\_\_ |
| 6. | “Stop Work” Authority and responsibility is understood | | | |  |  |
| 7. | First aid supplies, equipment and training | | | |  |  |
|  | A. | Obtaining treatment | | | \_\_\_\_\_\_ | \_\_\_\_\_\_ |
|  | B. | Location of Facilities | | | \_\_\_\_\_\_ | \_\_\_\_\_\_ |
|  | C. | Location and names of First-aid trained personnel | | | \_\_\_\_\_\_ | \_\_\_\_\_\_ |
| 8. | Emergency plan | | | |  |  |
|  | A. | Exit location and evacuation routes | | | \_\_\_\_\_\_ | \_\_\_\_\_\_ |
|  | B. | Use of fire fighting equipment (extinguishers, hose) | | | \_\_\_\_\_\_ | \_\_\_\_\_\_ |
|  | C. | Specific procedures (medical, chemical, etc.) | | | \_\_\_\_\_\_ | \_\_\_\_\_\_ |
| 9. | Vehicle safety | | | | \_\_\_\_\_\_ | \_\_\_\_\_\_ |
| 10. | Personal work habits | | | |  |  |
|  | A. | Serious consequences of horseplay | | | \_\_\_\_\_\_ | \_\_\_\_\_\_ |
|  | B. | Fighting | | | \_\_\_\_\_\_ | \_\_\_\_\_\_ |
|  | C. | Inattention | | | \_\_\_\_\_\_ | \_\_\_\_\_\_ |
|  | D. | Smoking policy | | | \_\_\_\_\_\_ | \_\_\_\_\_\_ |
|  | E. | Good housekeeping practices | | | \_\_\_\_\_\_ | \_\_\_\_\_\_ |
|  | F. | Proper lifting techniques | | | \_\_\_\_\_\_ | \_\_\_\_\_\_ |

NOTE TO EMPLOYEES: Do not sign unless ALL items are covered and ALL questions are satisfactorily answered.

The signatures below document that the appropriate elements have been discussed to the satisfaction of both parties, and that the supervisor and the employee accept responsibility for maintaining a safe and healthful work environment.

Date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Supervisor’s Signature: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Employee’s Signature: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

## PROTECTING TEMPORARY WORKERS

The Occupational Safety and Health Administration (OSHA) and the National Institute for Occupational Safety and Health (N IOSH) are aware of numerous preventable deaths and disabling injuries of temporary workers. One example is the death of a 27-year-old employed through a staffing agency to work as an equipment cleaner at a food manufacturing plant. While cleaning a piece of machinery, he came into contact with rotating parts and was pulled into the machine, sustaining fata l injuries. The manufacturing plant's procedures for cleaning the equipment were unsafe, including steps in which cleaners worked near the machine while it was energized and parts were moving. Additionally, while the company's permanent maintenance employees were provided with training on procedures to ensure workers were not exposed to energized equipment during maintenance or cleaning, this training was not provided to cleaners employed through the staffing agency. Source: Massachusetts Fatality Assessment and Control Evaluation (FACE) Program, 11 MA050.

Workers employed through staffing agencies are generally called temporary or supplied workers. For the purposes of these recommended practices, "temporary workers" are those supplied to a host employer and paid by a staffing agency, whether or not the job is actually temporary. Whether temporary or permanent, all workers always have a right to a safe and healthy workplace. The staffing agency and the staffing agency's client (the host employer) are joint employers of temporary workers and, therefore, both are responsible for providing and maintaining a safe work environment for those workers. The staffing agency and the host employer must work together to ensure that the Occupational Safety and Health Act of 1970 (the OSH Act) requirements are fully met. See 29 U.S.C. § 651. The extent of the obligations of each employer will vary depending on workplace conditions and should therefore be described in the agreement or contract between the employers. Their safety and health responsibilities will sometimes overlap. Either the staffing agency or the host employer may be better suited to ensure compliance with a particular requirement, and may assume primary responsibility for it. The joint employment structure requires effective communication and a common understanding of the division of responsibilities for safety and health. Ideally, these will be set forth in a written contract. OSHA and NIOSH recommend the following practices to staffing agencies and host employers so that they may better protect temporary workers through mutual cooperation and collaboration. Unless otherwise legally required, these recommendations are for the purpose of guidance and in some cases represent best practices.

## EVALUATE THE HOST EMPLOYER'S WORKSITE

Prior to accepting a new host employer as a client, or a new project from a current client host employer, the staffing agency and the host employer should jointly review all worksites to which the worker might foreseeably be sent, the task assignments and job hazard analyses in order to identify and eliminate potential safety and health hazards and identify necessary training and protections for each worker. The staffing agency should provide a document to the host employer that specifies each temporary worker's specific training and competencies related to the tasks to be performed.

Staffing agencies need not become experts on specific workplace hazards, but should determine what conditions exist at the worksite, what hazards may be encountered, and how to best ensure protection for the temporary workers. Staffing agencies, particularly those without dedicated safety and health professionals on staff, should consider utilizing a third-party safety and health consultant.

If information becomes available that shows an inadequacy in the host employer's job hazard analyses, such as injury and illness reports, safety and health complaints or OSHA enforcement history, the staffing agency should make efforts to discuss and resolve those issues with the host employer to ensure that existing hazards are properly assessed and abated to protect the workers. In assessing worksite hazards, host employers typically have the safety and health knowledge and control of worksite operations. However, the staffing agency may itself perform an inspection of the workplace, if feasible, to conduct their own hazard assessment or to ensure implementation of the host employer's safety and health obligations for temporary workers.

## TRAIN AGENCY STAFF TO RECOGNIZE SAFETY AND HEALTH HAZARDS

Many staffing agencies do not have dedicated safety and health professionals and, even when they do, these experts cannot be everywhere at once. By teaching agency representatives about basic safety principles and the hazards commonly faced by its temporary workers, the agency will be better equipped to discover hazards and work with the host employer to eliminate or lessen identified workplace hazards before an injury or illness occurs.

## ENSURE THE EMPLOYER MEETS OR EXCEEDS THE OTHER EMPLOYER'S STANDARDS.

When feasible, the host employer and staffing agency should exchange and review each other's injury and illness prevention program. Host employers should also request and review the safety training and any certification records of the temporary workers who will be assigned to the job. Host employers in certain industries, for example, will only accept bids from and hire staffing agencies that the host has previously verified as meeting the host employer's safety standards. Similarly, some staffing agencies work only with clients that have robust safety programs.

## ASSIGN OCCUPATIONAL SAFETY AND HEALTH RESPONSIBILITIES

Assign Occupational Safety and Health Responsibilities and Define the Scope of Work in the Contract. The extent of the responsibilities the staffing agency and the host employer have will vary depending on the workplace conditions and should be described in their agreement. Either the staffing agency or the host employer may be better suited to ensure compliance with a particular requirement and may assume primary responsibility for it. When feasible, the agency-host contract should clearly state which employer is responsible for specific safety and health duties. The contract should clearly document the responsibilities to encourage proper implementation of all pertinent safety and health protections for workers. This division of responsibilities should be reviewed regularly.

The tasks that the temporary worker is expected to perform, and the safety and health responsibilities of each employer, should be stated in the agency-host contract and should be communicated to the worker before that worker begins work at the job site.

For example, should the job tasks require personal protective equipment, the contract should state what equipment will be needed and which employer will supply it. The worker should be informed of these details before beginning the job.

## CLEARLY DEFINE TASKS

Clearly defining the scope of the temporary worker's tasks in the agency host contract discourages the host employer from asking the worker to perform tasks that the worker is not qualified or trained to perform or which carry a higher risk of injury. Defining, clarifying, and communicating the employers' and worker's responsibilities protects the workers of both the staffing agency and of the host employer. The contract should specify who is responsible for all such communications with the temporary worker.

## INJURY AND ILLNESS TRACKING

Employer knowledge of workplace injuries and investigation of these injuries are vital to preventing future injuries from occurring. Information about injuries should flow between the host employer and staffing agency. If a temporary worker is injured and the host employer knows about it, the staffing agency should be informed promptly, so the staffing agency knows about the hazards facing its workers. Equally, if a staffing agency learns of an injury, it should inform the host employer promptly so that future injuries might be prevented, and the case is recorded appropriately. The parties should therefore also discuss a procedure to share injury and illness information between the employers, ideally specifying that procedure contractually.

NOTE on Injury and Illness Recordkeeping Requirements:

Both the host employer and staffing agency should track and where possible, investigate the cause of workplace injuries. However, for statistical purposes, OSHA requires that injury and illness records (often called OSHA Injury and Illness Logs) be kept by the employer who is providing day-to-day supervision, i.e., controlling the means and manner of the temporary employees' work (the host employer, generally). See 29 CFR 1904.31(b)(2). **The agency-host contract should therefore identify the supervising employer and state that this employer is responsible for maintaining the temporary workers' injury and illness records. Employers cannot discharge or contract away responsibilities that pertain to them under law.** Further, the contract should specify which employer will make the records available upon request of an employee or an employee representative.

The supervising employer is required to set up a method for employees to report work-related injuries and illnesses promptly and must inform each employee how to report work-related injuries and illnesses. **However, both the staffing agency and the host employer should inform the temporary employee on this process and how to report a work-related injury or illness.** See 29 CFR 1904.35(b).

No policies or programs should be in place that discourages the reporting of injuries, illnesses or hazards. The OSH Act prohibits employers from retaliating against a worker for reporting an injury or illness, including for filing a workers' compensation claim for a work-related condition.

## CONDUCT SAFETY AND HEALTH TRAINING AND NEW PROJECT ORIENTATION.

OSHA standards require site- and task-specific safety and health training. The training must be in a language the workers understand. Training helps to protect the workers of both the staffing agency and the host employer.

The training of temporary workers is a responsibility that is shared between the staffing agency and the host employer. Staffing agencies should provide general safety and health training applicable to different occupational settings, and host employers provide specific training tailored to the particular hazards at their workplaces. **The host employer and the staffing agency should each provide- separately or jointly- safety and health orientations for all temporary workers on new projects or newly-placed on existing projects.** The orientation should include information on general worker protection rights and workplace safety and health. At least one of the joint employers, generally the host employer, must provide worksite-specific training and protective equipment to temporary workers, and identify and communicate worksite-specific hazards.

The temporary workers' tasks, as defined by the agency-host contract, should also be clearly communicated to the workers and reviewed with the host employer's supervisor(s). **Host employers should provide temporary workers with safety training that is identical or equivalent to that provided to the host employers' own employees performing the same or similar work.** Host employers should inform staffing agencies when such site-specific training for temporary workers has been completed. Informing workers and supervisors of their respective responsibilities agreed upon by the joint employers protects the workers of both the staffing agency and the host employer.

## FIRST AID, MEDICAL TREATMENT, AND EMERGENCIES

Procedures should be in place for both reporting and obtaining treatment for on-the-job injuries and illnesses. Temporary employees should be provided with information on how to report an injury and obtain treatment on every job assignment. **Host employers should train temporary employees on emergency procedures including exit routes.**

## INJURY AND ILLNESS PREVENTION PROGRAM

It is recommended that staffing agencies and host employers each have a safety and health program to reduce the number and severity of workplace injuries and illnesses and ensure that their temporary workers understand it and participate in it. The employers' safety programs should be communicated at the start of each new project, whenever temporary workers are brought onto an existing project, or whenever new hazards are introduced into the workplace.

**NOTE: Employers are required to have hazard-specific programs when workers are exposed to certain hazards. Such programs include bloodborne pathogens, hearing conservation, hazard communication, respiratory protection, and control of L hazardous energy (lock-out/tag-out)**

Contractors and employers who do construction work must comply with standards in 29 CFR 1926, Subpart C, General Safety and Health Provisions. These include the responsibilities for each contractor/employer to initiate and maintain accident prevention programs, provide for a competent person to conduct frequent and regular inspections, and instruct each employee to recognize and avoid unsafe conditions and know what regulations are applicable to the work environment.

## INJURY AND ILLNESS PREVENTION PROGRAM ASSESSMENTS.

The employers should identify and track performance measures key to evaluating the program's effectiveness. For both staffing agencies and host employers, a quality program will stipulate how there will be ongoing assessments to evaluate the consistency, timeliness, quality and adequacy of the program. Leading indicators, such as training and number of hazards identified and corrected, should be included in the assessments. Generally speaking, these assessments should take place at least on an annual basis with a competent internal team or a combined internal and external team. The value of these assessments is the resulting prioritized recommendations for program improvement.

## INCIDENTS, INJURY AND ILLNESS INVESTIGATION

In addition to reporting responsibilities, employers should conduct thorough investigations of injuries and illnesses, including incidents of close-calls, in order to determine what the root causes were, what immediate corrective actions are necessary, and what opportunities exist to improve the injury and illness prevention programs. It is critical that both the staffing agency and host employer are engaged in partnership when conducting these investigations.

## MAINTAIN CONTACT WITH WORKERS

The staffing agency should establish methods to maintain contact with temporary workers. This can be as simple as the agency representatives touching base with the workers throughout the temporary assignment, such as when the representatives are at the site to meet with the host employer or to drop off paychecks, or by phone or email. The staffing agency has the duty to inquire and, to the extent feasible, verify that the host has fulfilled its responsibilities for a safe workplace. **The staffing agency should have a written procedure for workers to report any hazards and instances when a worker's tasks are altered by the host employer from those previously agreed upon.** The staffing agency and host employer should inform workers how to report hazards and/or changes to job tasks. For example, some staffing agencies have a hotline for their workers to call to report problems at the host employer's worksite. The staffing agency distributes this phone number during the orientation. The staffing agency should follow up on a worker's safety and health concerns and any complaints with the host employer, as well as investigate any injuries, illnesses and incidents of close calls.

## HOW CAN WE HELP?

We provide safety compliance audits and free phone consultations. Every employer needs a comprehensive Safety Manual. We can create a custom safety manual for your firm. <http://www.oshadefenders.com>

**HOW CAN OSHA HELP?**

OSHA has a great deal of information to assist employers in complying with their responsibilities under the law. Information on OSHA requirements and additional health and safety information is available on the OSHA website (www.osha.gov). Further information on protecting temporary workers is available at the OSHA Temporary Worker webpage (www. osha.gov/temp\_workers).

The OSH Act prohibits employers from retaliating against their employees for exercising their rights under the OSH Act. These rights include raising a workplace health and safety concern with the employer, reporting an injury or illness, filing an OSHA complaint, and participating in an inspection or talking to an inspector. If workers have been retaliated against for exercising their rights, they must file a complaint with OSHA within 30 days of the alleged adverse action. For more information, please visit [www.whistleblowers.gov](http://www.whistleblowers.gov).

**HOW CAN NIOSH HELP?**

The National Institute for Occupational Safety and Health (NIOSH) is the federal agency that conducts research and makes recommendations to prevent worker injury and illness. Recommendations for preventing worker injuries and illnesses across all industries and for a wide variety of hazards are available on the NIOSH website ([www.cdc.gov/](http://www.cdc.gov/) niosh). To receive documents or more information about occupational safety and health topics, please contact NIOSH at 1-800-CDC-INFO (1-800-232-4636), TTY 1-888-232-6348.

The NIOSH Fatality Assessment and Control Evaluation (FACE) program investigates selected work-related fatalities to identify high-risk work injury situations and to make recommendations for preventing future similar deaths. Investigations are conducted by NIOSH and state partners.

For more information and links to reports of temporary worker deaths, please visit www.cdc.gov/niosh/face. The Michigan and Massachusetts FACE programs have developed 1-2 page Hazard Alerts on temporary worker deaths that are available on their websites (www.oem.msu.edu/userfiles/fi le/MiFACE/TemporaryWorkerHA 17.pdf and [www.mass.gov/eohhs/docs/dph/occupationalhealth/](http://www.mass.gov/eohhs/docs/dph/occupationalhealth/) temp-workers.pdf).

The NIOSH Health Hazard Evaluation (HHE) Program provides advice and assistance regarding work-related health hazards. NIOSH may provide assistance and information by phone, in writing, or may visit the workplace. The HHE Program can be reached at [www.cdc.gov/NIOSH/HHE or 513-841-4382](http://www.cdc.gov/NIOSH/HHE%20or%20513-841-4382).