



# Temporary Worker Safety

Safety Best Practices

# Overview

Through the establishment and implementation of employee safety best practices, staffing firms and their customers can improve employee safety and well-being.



# Overview

Staffing firms and companies have a general duty to take reasonable steps to

- Determine conditions at the work site
- Provide generic safety information
- Advise how to protect from hazards on the job



# Staffing Firm Responsibilities

- Reasonable steps to determine working conditions
  - Risk assessment and analysis
    - Penalties for failure to assess
  - Internal employee training
- Provide generic safety information
- Incident procedures
- Accurately utilize workers' compensation class codes
- Written agreement outlining each party's responsibilities



# Company Responsibilities

- Maintain a safe and healthy workplace
- Primarily responsible for ensuring safety of temporary employees
  - OSHA
  - Control of worksite
  - Supervise employees
- OSHA 300 Log
- 1986 Hazardous Communication Standard
  - Workplace Substances



# General Management - Staffing Firm

- Corporate Safety Policy
- Management of Workplace Incidents
  - Reporting Incidents
  - Timeline for reporting
  - Post-Accident/Injury treatment
  - Incident Investigations
  - Equipment Inspection
  - Root Cause Analysis
  - Insurance and Crisis Management
  - Circumstances needing safety manager



# General Management - Company

- Consent to follow procedures regarding temporary employee incidents
  - Transporting employees
  - Notifying Staffing Firm
  - Contact Information at Staffing Firm
  - Investigation Collaboration
  - OSHA 300 log
  - Back to work programs
  - Written Job Descriptions / Scope of work



# Temporary Employee Process

- Provide safety policies, worker expectations and general safety overview
  - Basic assessment
- Drug and Background policy
  - Clearly establish company's scope of background check
- Employee Handbook
- Assignment Orientation
- General Safety Training and Ongoing Communication



# Customer Selection Process

- Risk Assessment
- Credit Check
- Recordable Incidents
- Safety History
- Workplace Incident Rate
- Job Hazard Analysis per assignment
- Review of Safety policies, procedures
- Equipment Inspection
- Training
- Security



# Staffing Partnership

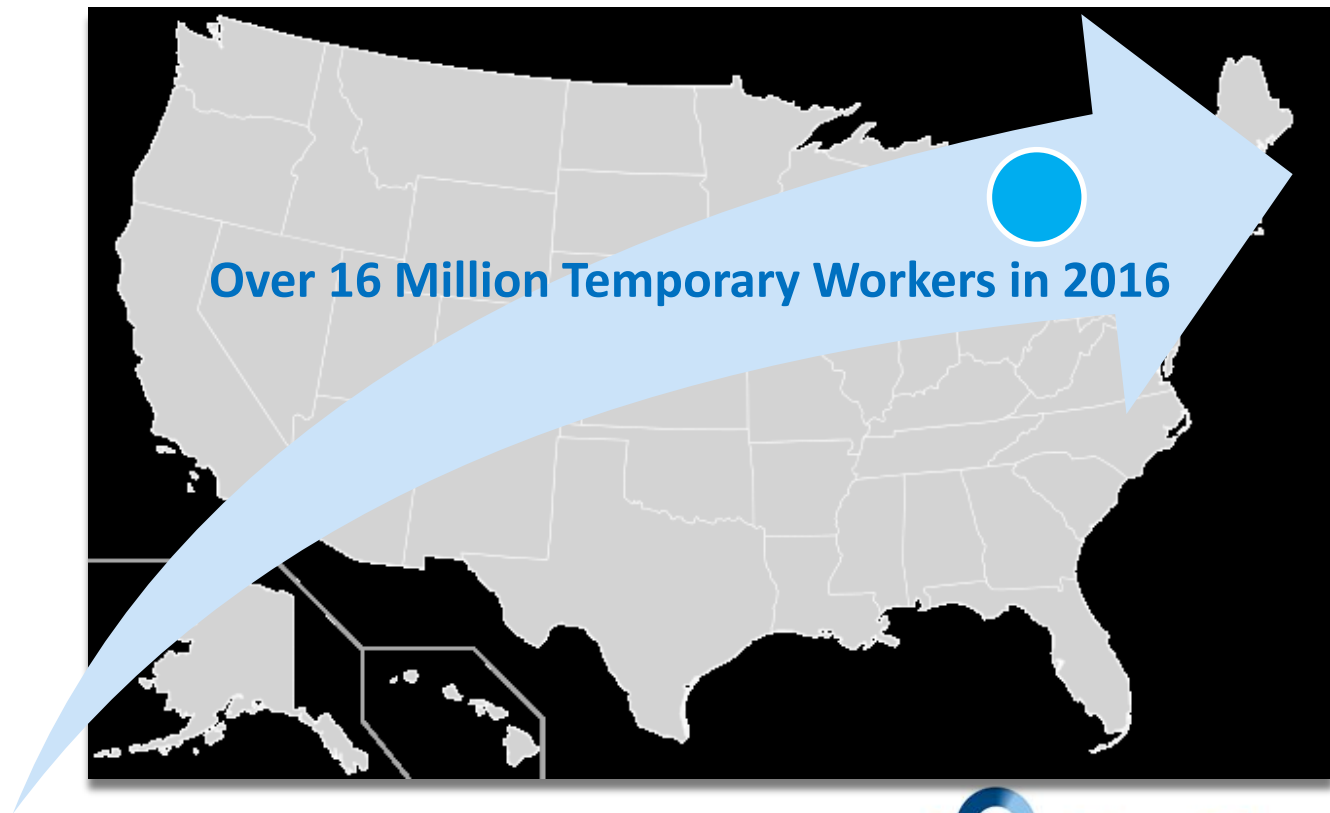
Temporary employees should be trained and oriented the same way internal employees are trained and oriented.

- Obtain training documents
- PPE and Site Specific Training
- Communicate safety violations
- Communication with OSHA



# The ASA and OSHA

## Growth of Temporary Workforce



# The ASA and OSHA

## Increased Likelihood of Injury

- New workers are at increased risk of injuries. Temporary workers are often new to a jobsite several times a year
- Temporary workers are at greater risk of workplace injury than non-temps
- Host employers are less likely to devote resources to fully train Temporary workers



### SITE SPECIFIC SAFETY TRAINING VERIFICATION FORM

This form can be used to verify that required site specific customer training has been completed, to include first day safety orientations, forklift, powered pallet jack, crane/hoist, floor scrubber, compactor/bailer, machinery, tools, and other equipment.

DATE: \_\_\_\_\_

CUSTOMER NAME: \_\_\_\_\_

CUSTOMER ADDRESS: \_\_\_\_\_

CUSTOMER INSTRUCTOR: \_\_\_\_\_

STAFFMARK BRANCH LOCATION: \_\_\_\_\_

TRAINEE NAME	TRAINING DATE	EQUIPMENT TYPE/TASK	SUCCESSFUL COMPLETION (Indicate yes/no)

Please retain a copy of the training records for 3 years.

# The ASA and OSHA

## Temporary Worker Initiative

- To ensure that staffing agencies and host employers understand their responsibilities under the Occupational Safety and Health Act.
- Temporary workers are entitled to the **SAME** safety and health protections as direct-hire employees.



# The ASA and OSHA

## Temporary Worker Initiative Background

Recent cases include workers exposed to serious hazards without proper protection and training.

- Dangerous heat stress
- Lack of essential personal protective equipment (PPE)
- Exposure to hazardous energy requiring lock out/tag out



# The ASA and OSHA

## Top Violations at Worksites with Temporary Workers

- Electrical
- Lockout/Tagout
- Machine Guarding
- Fall Protection
- Hazard Communication
- Powered Industrial Trucks

# Supervisors and Managers

## What a Host Employer's Management Should Know about Temporary Workers

- Managers are responsible for their workers' safety, including any temporary workers under their control, and the host employer should treat the temporary worker the same as it treats its existing workers with respect to worker safety and health.



# Company Responsibilities

- Train supervisors on OSHA requirements for safety of temporary workers and the allocation of safety responsibilities in any executed staffing agreements
- Ensure that supervisors know how to manage all workers when unsafe behaviors happen
- Maintain regular communication with a temporary worker's staffing agency
- Ensure that temporary workers are accounted for and specifically referred to in a host employer's safety and health policies
- Revise, review and update (when necessary) the procedure and risk assessments/job safety analysis for the activities taking place on the host employers' premises, which should be documented and shared with the staffing agency





## Safety Review Form

Prospect/Customer Facility: \_\_\_\_\_

Date: \_\_\_\_\_

Reviewed by: / Branch: \_\_\_\_\_/\_\_\_\_\_

# of Temps: \_\_\_\_\_

Markup: \_\_\_\_\_

WC Code: \_\_\_\_\_

*Please note that not every section will apply to every customer site. You need only complete the sections that are applicable to your customer site.*

### GENERAL WORK ENVIRONMENT

1. Does the customer conduct site-specific orientations and safety training for temporary employees in the same manner as its direct employees?  
Yes  No
2. Are worksites clean, sanitary and orderly and are aisles and passageways kept clear? Yes  No
3. Are work areas and surfaces kept clean and dry and are they adequately illuminated? Yes  No
4. Are standard guardrails provided wherever aisle or walkway surfaces are elevated more than 4 feet above any adjacent floor or ground and on all stairways? Yes  No  NA
5. Will employees be working above or below floor/ground level? Yes  No   
If yes, is fall protection provided? Yes  No  **Contact Safety for any assignment 3 ft below grade or over 4 ft high**
6. Are employees prohibited from working in confined spaces? (employees are not permitted to enter pits, vats, tanks, manholes, vessels, silos, etc.) Yes  No
7. Are employees doing any work involving welding, brazing, cutting, or electrical work? Yes  No
8. Is there proper ventilation in the work areas? Yes  No

### SAFETY AND HEALTH PROGRAMS

1. Does the customer have a first aid/emergency response program in place on each shift? Yes  No
2. Is there a nearby medical facility where employees will be sent if injured? Yes  No  If Yes, name of facility: \_\_\_\_\_
3. Are employees supervised on each shift? Yes  No
4. **State Specific OSHA Safety Plans:** Where applicable, has the Customer/ Prospect acknowledged that they are in compliance with state requirements and have a formal written safety plan, per state requirement, fully implemented within the facility (*i.e.*, CA state customers must have an Injury and Illness Prevention Program (IIPP), WA state customers must have an Accident Prevention Plan (APP), etc.) Yes  No  NA

### PERSONAL PROTECTIVE EQUIPMENT (PPE) AND HAZCOM

1. Review each temporary job position and place a check next to the required PPE. Has the customer completed the certification of hazard assessment to determine if there are any hazards, which necessitates the use of PPE in accordance with OSHA standard 1910.132 (d)(1).  
Yes  No
2. Does the customer provide training on how to properly use and maintain PPE. Yes  No   
 Safety Glasses, face mask or Goggles (Circle One or both if applicable)  Steel toed shoes / boots  
 Hard Hat\*  Ear Plugs \*\*  Work Gloves  Respirator\*  Dust Masks\*  Other\_\_\_\_\_  NA



## HAZARD COMMUNICATION

1. Do employees handle, use or have exposure to any chemicals, including solids, liquids or gasses at the customer site?  
Yes  No
2. Will all employees receive site specific Hazard Communication training from the customer when starting their assignment?  
Yes  No

## MACHINE OPERATION – if applicable

1. Will employee operate any machinery (or utilize any tools) while on assignment? Yes  No

Machinery that will be operated	Tools that will be utilized

Will employee be cleaning, performing maintenance and/or set up for any of the equipment listed above?  
Yes  No  If "Yes" Contact Safety

2. Does the customer conduct documented site-specific safety orientations and safety training for temporary employees before operating equipment or tools and will the customer provide documentation the branch? Yes  No  NA
3. Is machinery and moving components properly guarded with barrier guards and safety devices? Yes  No  NA

## FORKLIFT OPERATION (or other motorized vehicle) – if applicable, ie, crane, floor scrubber, compactor, etc.

1. Will employee operate any powered industrial equipment while on assignment? Yes  No  If yes, list specific types and obtain safety approval:

2. Do employees receive documented site-specific training before operating a forklift, or other motorized vehicles and will the customer provide written documentation to the branch? Yes  No  NA
3. Has customer signed a Service agreement that includes vehicle liability? Yes  No   
*Do not supply temporaries until this has been signed.*
4. **Carbon Monoxide Exposure:** If applicable, has the customer conducted Carbon Monoxide testing within the environment?  
Yes  No  (This may be applicable in warehouse environments where non-electric powered industrial trucks are used. *i.e.*, propane powered forklifts).



# Safety Review Form

## ADDITIONAL COMMENTS THAT SAFETY SHOULD KNOW

Please make any notes or comments regarding any of the items checked above and reference the item #.

### SUMMARY

Are any of the positions or job duties for this customer on the Do Not Staff list (RM 011)? Yes  No   
(If YES, contact your Safety Director prior to placing temporary employees on assignment)

Did you physically tour the Customer facility to obtain the specifics you have outlined above and forward to your Regional Safety Director for review?  
Yes  No  Date of tour: \_\_\_\_\_ Date sent to Regional Safety Director: \_\_\_\_\_

Is the Customer/ Prospect willing or able to accommodate light/ modified duty positions? Yes  No

Describe what the company manufactures, produces or does: \_\_\_\_\_

List below any specific job titles, job descriptions, weight to be lifted and their departments for which you are seeking safety approval.

Job Title	Brief Job Description	List Maximum Weight to be lifted	Department

Is any of the work listed above repetitive or require the employee to work in awkward positions? Yes  No

### NEXT STEPS

Please email a copy of this completed form to your Regional Safety Director and contact them to discuss your findings. Also place a copy in your branch customer file and document in your operating system that you have completed a Site Visit and Safety Review.

*NOTE: A Safety Review must be completed annually (every 12 months) by internal staff to evaluate each site location for all new and existing industrial customers. The review must be updated for assignments that have not been staffed in the past six months or if there is a change in job duties.*



## WRITTEN PROGRAMS REQUIRED BY OSHA

The following programs are required by OSHA standards. Some or all of these may apply to your operation. Safety personnel from Staffmark can assist you in making this assessment. Please note that the discussion of each program is brief, and an attempt to develop a specific program based upon these descriptions is **not advised**. For complete and detailed program requirements, a copy of the OSHA General Industry Standards should be obtained.

- OSHA FORM 300:** The "Log and Summary of Occupational Injuries and Illnesses" is required by law to be kept in the establishment for five (5) years. This form is used to record every occupational death, illness, and injury involving medical treatment (other than first aid), loss of consciousness, restriction of work or motion, or transfer to another job. The Summary must be posted each year from February through April. OSHA only requires maintenance of this log if there are ten or more employees unless directed to do so by the Department of Labor. Under HB 308, all public employers are required to maintain the OSHA 300 Log, regardless of the number of employees.
- OSHA FORM 301:** The "Supplementary Record of Occupational Injuries and Illnesses" is used to supplement the OSHA 300 Log. It's maintained for five (5) years and must be available in the establishment for inspection. This is used to provide detailed information on injuries and illnesses, how they occurred, and how to prevent a re-occurrence. The **Staffmark Incident Report** can be substituted for the OSHA 301 Form.
- HAZARD COMMUNICATION PROGRAM:** Each employer is required to develop a written Hazard Communication (HAZCOM) Program to include, but is not limited to: 1) an inventory of all hazardous chemicals in the workplace, 2) employee training of the hazards associated with exposure to these chemicals, and 3) maintenance of Safety Data Sheets (SDS). Violations of this standard accounts for the top four violations cited by OSHA. In 2012 OSHA modified the Hazard Communication Standard to align with the Globally Harmonized System of Classification and Labeling of Chemicals (GHS). This resulted in three major areas of change: 1. Hazard Classification, 2. Labels, and 3. Safety Data Sheets (SDS). **REFERENCE: OSHA Std 29 CFR 1910.1200.**
- EMERGENCY ACTION / FIRE PREVENTION PLAN:** The Emergency Action Plan shall be written (can be verbal if ten or less employees) and include, but is not limited to: 1) emergency escape procedures, 2) operation of critical operations, 3) accounting procedures for all employees, and 4) rescue duties. The Fire Prevention Plan shall be written (verbal if less than ten employees) and include, but is not limited to: 1) list of major workplace fire hazards, and 2) names of personnel responsible for maintenance of fire control and prevention equipment. For both plans, employees shall be appropriately trained. **REFERENCE: OSHA Std 29 CFR 1910.38.**
- POWERED INDUSTRIAL TRUCK TRAINING:** All operators of powered industrial trucks shall be trained specific to the type of forklift and operation at hand. Training should be documented and the plan should be written to reflect training responsibilities and re-training requirements as required by OSHA. **REFERENCE: OSHA Std 29 CFR 1910.178.**
- CONFINED SPACE ENTRY:** Each employer is required to evaluate workspaces to determine if there are any confined spaces as defined by OSHA, and if so, identify those that are permit-required confined spaces. The employer is required to establish a formal plan for entering these areas, establish emergency rescue procedures, and document employee training. **No employee shall be required to enter any confined space unless a written confined space entry procedure is developed.** **REFERENCE: OSHA Std 29 CFR 1910.146.**
- FIRST AID TRAINING:** At least one individual per shift is required to be trained in first aid if the work location is not in "near proximity" to medical assistance. Some OSHA offices define "near proximity" as three (3) minutes or less response time for Emergency Medical Services. **REFERENCE: OSHA Std 29 CFR 1910.151.**
- BLOODBORNE PATHOGEN EXPOSURE PROGRAM:** If the potential exists for employee exposure to blood or other body fluids in the course of normal work duties, the employer is required to implement a program to deal with the exposure. This program is to include a written exposure control plan, employee training, personal protective equipment, laundry controls, engineering controls, and waste disposal procedures. Included in this program are first aid responders discussed above. **REFERENCE: OSHA Std 29 CFR 1910.1030.**

- HEARING CONSERVATION PROGRAM:** Occupational noise levels must be elevated by an industrial hygienist to determine if a hazard exists and what appropriate protection is required. If noise levels exceed the established OSHA standard, then a formal Hearing Conservation Program **must** be established to include 1) noise monitoring, 2) employee training, and 3) periodic hearing examinations. **REFERENCE: OSHA Std 29 CFR 1910.95.**
- HOIST / CRANE / SLING INSPECTION PROGRAM:** All hoists, cranes, and slings shall be inspected regularly, and such inspections shall be documented. **REFERENCE: OSHA Std 29 CFR 1910.179 and 1910.184.**
- ELECTRICAL SAFETY-RELATED WORK PRACTICES PROGRAM:** A program shall be established to provide training for employees whose job duties may expose them to the risk of electrical shock while working near exposed live conductors or other electrical equipment. The content of the training shall include all standard work practices addressed in the standard. This type of training shall be of the classroom or on-the-job type. The degree of training shall be determined by the risk to the employee. **REFERENCE: OSHA Std 29 CFR 1910.331 to 1910.335 and 1910.399.**
- LOCKOUT / TAGOUT PROGRAM:** A written Lockout/Tagout Program is required for the servicing and maintenance of machines and equipment in which the unexpected start-up or energization, or release of stored energy could cause injury to employees. Under this program all possible sources of energy must be identified and secured (locked out) and then tagged to warn other employees why the equipment is turned off. **REFERENCE: OSHA Std 29 CFR 1910.147 and 1910.333.**
- PERSONAL PROTECTIVE EQUIPMENT:** Each employer is required to perform and document a hazard assessment of the workplace to determine if hazards exist that make the use of personal protective equipment (PPE) necessary, and then select the appropriate equipment. Employees must be trained on when PPE is necessary, what PPE is required, how to use the PPE, limitations of the PPE, and proper care and maintenance of PPE. **REFERENCE: OSHA Std 29 CFR 1910.132. (Contact your Regional Safety Director if you are asked to pay for or provide PPE for your temporary employees)**
- RESPIRATORY PROTECTION PROGRAM:** Any use of respiratory protection requires initial air monitoring to validate the need for such protection. If respiratory protection is required, then a formal, written respiratory protection program is required, to include 1) medical surveillance of the employee to insure fitness to wear a respirator, 2) care and maintenance program, 3) employee training, 4) proper storage of respirators, and 5) fit testing program. **Note:** Even the voluntary use of respirators requires the application of the entire OSHA standard. **REFERENCE: OSHA Std 29 CFR 1910.134.**
- HOT WORKS PERMIT PROGRAM:** Before cutting or welding is permitted, the area shall be inspected by the individual responsible for authorizing cutting and welding operations who shall designate precautions to be followed in granting authorization to proceed preferably in the form of a written permit. Fire watchers shall be required whenever welding or cutting is performed in locations where other than a minor fire might develop. All welding and cutting equipment shall be inspected prior to use. **REFERENCE: OSHA Std 29 CFR 1910.252 to 1910.254.**
- (CA ONLY) INJURY AND ILLNESS PREVENTION PROGRAM:** Every California employer must establish, implement and maintain an effective written Injury and Illness Prevention Program (IIPP) and a copy must be maintained at each worksite or at a central worksite if the employer has non-fixed worksites. An IIPP shall consist of the following eight elements:
- Responsibility
  - Compliance
  - Communication
  - Hazard Assessment
  - Accident/Exposure Investigation
  - Hazard Correction/Abatement
  - Training and Instruction
  - Recordkeeping

# Weekly Safety Message

## Safety is Everyone's Responsibility

A few simple points you can do to help provide a safe environment for everyone.

Don't leave pallets standing on end. Stack pallets neatly!

Housekeeping in the facility is very important for accident prevention. Properly dispose of all trash and debris.

Maintain aisle ways so that there's clear, unfettered access throughout the facility.



—Staffmark Safety Department



# The ASA and OSHA

The ASA and OSHA collaborate to protect the well being of temporary employees.

Safe + Sound Week – June 12-18

- Awareness of value of Health and Safety Programs

Temporary Worker Initiative

- Bloodborne Pathogens Training
- Powered Industrial Truck Training



# Severe Injury Reporting

Effective January, 2015, OSHA requires that employers report, within 24 hours, the following incidents:

- Amputation
- Hospitalization
- Eye Loss
- Fatality





## OSHA's New Incident Reporting Criteria For Staffmark Branches

In the event a Staffmark temporary employee is involved in a work related incident/accident that fits the scenarios below, you must contact your Safety Director and Risk Department immediately.

- Any life threatening event: (fainting, heart attack, stroke, seizures, serious chest pain, etc.)
- Any amputation of a body part (finger-tip, ear, toe etc.)
- An uncontrollable bleeding event that requires more than first aid and needs medical attention.
- Any event causing an overnight stay in a hospital (for more than just observation)
- Any serious eye event (loss of an eye, embedded object etc.)

It is extremely important that all Staffmark representatives follow these criteria due to OSHA strong interest in reporting serious incidents timely.

The Risk Management Department will impose a penalty to the offending location of **\$1,000 per non-report**. Also, the offending location will be accountable for any monetary fines imposed by OSHA due to the non-timely reporting of said incidents.

*(This is to be used as a reminder, post in the branch office area as a reference.)*



# Powered Industrial Trucks

## Training

- Companies implement program
- Training must include evaluation
- Formal Instruction (Lecture, Video, Documents)
- Practical Training
- Refresher Training
- Evaluation of Performance
- Certification and Evaluation on file
- Generic – Staffing Firm

## Forklift/Powered Industrial Truck Procedures

**Objective:** This document outlines the procedures to be followed for any temporary employee that will be driving a Forklift and/or any type of Powered Industrial Truck. As a reminder per RM 011 (Do Not Staff List), safety approval is required before staffing any Powered Industrial Truck positions.

1. **CUSTOMER VEHICLE:** If the temporary employee is to drive a forklift/power industrial truck, the customer **MUST SIGN a service agreement that contains the vehicle liability language.** Legal 104, 106 or 107 is acceptable if the customer is using temporary employees for these operations.
2. To comply with Staffmark's policy surrounding the operation of a forklift or other power industrial vehicles, Staffmark's Forklift and PIT substance abuse policy requires that you must confirm a negative result PRIOR to placing the employee on assignment. A 5-panel drug screen must be administered in-house via a urine cup, swab test, or at a Lab facility. For any invalid result (any non-negative in-house drug test result should be considered invalid), the employee must be instructed to test at a lab facility within 24 hours. For Forklift and PIT assignments, if a negative drug test was successfully completed within the last 30 days, a new test will not be necessary if you place a temporary on a new assignment that also requires a pre-employment drug screen. However, be sure to check with each individual customer as to their pre-screening requirements to ensure that Staffmark's 30-day rule coincides with the customer's policy and meets their expectations.
3. Preferred 6 months of prior experience utilizing a Forklift and/or Powered Industrial Truck should be verified by Staffmark prior to the employee beginning assignment. This may be done through reference verification or by obtaining a copy of a prior forklift or powered industrial truck certification from the employee.
4. The employee will review the Forklift/Powered Industrial Truck Safety Guide (RM 045) and then complete the appropriate Prove It Assessment and meet a minimum score of 60% (unless customer specifies different scoring) to be placed on a Powered Industrial Truck assignment. If the employee passes the test on the first attempt, have them sign the Forklift/Powered Industrial Truck Safety Guide Acknowledgement (TEMP 285). This signed acknowledgement should be scanned into the employee file in PeopleSoft.

Should the employee not achieve a score of 60%, the employee may take a retest to meet the minimum requirements. Prior to the retest, please review with the employee the questions that they missed (RM 160) and ask that they study those sections of the Forklift/Powered Industrial Truck Safety Guide (RM 045). Upon a passing score have the employee sign off on the Forklift/Powered Industrial Truck Safety Guide Acknowledgement (TEMP 285). Employee may take the assessment multiple times. If they continue to fail the assessment, you may assess their other abilities and determine if you can utilize them for assignments other than Forklift/Power Industrial Truck assignments.

5. **The customer must train and site-certify the temporary employee and provide a copy of the training certificate with all the information indicated on form RM 007 (Customer Site Specific Training) or customer equivalent. (Note: Whenever available, customer training records are the preferred method over RM 007.)**

Once the customer has provided proof that the employee has been site certified, please document on the customer record in Peoplesoft. In Peoplesoft, enter a History item and select the Event type 'Forklift Customer Certification'. This will serve as confirmation that the Forklift Certification training was completed. Additionally, place a copy of the training information in the personnel file of the temporary employee.



Thank you!