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# Consider This

## HEALTH & SAFETY NEWSLETTER
## SEPTEMBER 2016

Updating Your Onboarding Program

5 Tips for Reporting Severe Injuries to OSHA

The Dollars and Cents of OSHA's Penalty Policy

12 Safety Regulations with Annual Requirements

Captain Obvious

Working Safely with Scissor Lifts

**Work Safe. Live Safe. Stay Safe.**

# Updating Your Onboarding Program

An engaging onboarding program sets the stage for your new employee to hit the ground running. A well-designed onboarding program creates motivation for you and your new hire to get the most from this stage in the work lifecycle.

***Why is onboarding important?***

Orientation to a company typically involves showing new employees the ropes and filling out the right forms—a thoughtful onboarding program does more. Onboarding is your chance to create the best possible environment for your new talent. With the right moves, you can reduce administrative costs, boost engagement, and accelerate the productivity of new workers. This is a safety professional's time to engulf employees in the company's safety culture and expectations. In most industries, new hires or an employee who has moved to a new position or task carry the highest potential for injuries and accidents because they are new to the team and the work. A proper onboarding program reduces these risks.

***Orientation***

The orientation process should include an overview of the general facility, job-related roles, and the overall culture of safety.

***On-the-Job Safety Training***

Employers should provide useful on-the-job safety training that promotes the organization's overall safety culture. These activities include on-the-job safety training and an orientation.

On-the-job safety training and orientation should include both skill-based and awareness-based training. This gives employees tactical knowledge and cultural awareness of why safety practices are important.

**Skill-based training** demonstrates the actual hands-on procedures necessary to perform a specific task, such as operating a piece of machinery.

**Awareness-based training** includes general policies, hazard recognition and expectations for maintaining a safe and healthy work environment.

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# Updating Your Onboarding Program (Cont.)

***Onboarding does not end on the first day of work***

High-quality onboarding programs continue for several months after hire. When the onboarding process concludes, be sure to engage your employee in an evaluation of your onboarding process. During the first months of employment, check-in with your employee to ensure they receive needed support and are aware of training opportunities available to them within the company.

Use feedback to engage employees in an ongoing conversation about the ways to improve your onboarding program. Proactive onboarding increases employee satisfaction, workforce stability, and decreases turnover. Stay relevant by increasing engagement through excellence in onboarding.

***Onboarding best practices***

Each business, and position, has its own expectations. While the characteristics of your workplace may call for specialized safety, technological, and other training, there are basic features of a good onboarding program that transfer well across all environments.

Consider these suggestions for creating a dynamic onboarding process:

- **Readiness:** Ensure your onboarding program design is flexible enough to create custom and standard forms. Be sure your new hire receives only the forms, and data, they need for their position.
- **Make it personal:** It can take new hires up to a year to gain the social and technical proficiency needed to deliver the productivity rate you need. Give your new hire their best chance to adjust into your company culture by reaching out prior to their first day.
- **Prepare for onboarding:** Use email, intranet, or a newsletter to let employees and team members learn of their incoming associate. Develop an itinerary and recruit a first-day mentor to help throughout the onboarding process.
- **Job clarity:** Be sure your new hire has a one-on-one opportunity to meet with their manager, to learn specific expectations and discuss potential job hazards and to ask questions.

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# Updating Your Onboarding Program (Cont.)

## Top Mistakes of Onboarding Programs

1

**The wrong definition and limited goals.** The first and most impactful error is to define the program as orientation as opposed to onboarding. The goal is to decrease the time it takes for a new hire to reach the minimum expected productivity level on the job. Onboarding lasts longer, occurs at several organizational levels, is metric-driven, and has a greater business impact.

2

**Overloading new hires.** Overloading new hires on the first day with a volume of information and questions results in sensory overload. Putting new hires under this kind of pressure makes it unlikely that they will ask tough questions, make good decisions, or remember a majority of the information.

3

**Failing to extend the timeframe.** The best programs start before the employee's first day (pre-boarding) and continue for up to six to 12 months. By stretching out the process, you help to ensure the new hire is not overwhelmed on their first day.

4

**Not offering onboarding at multiple organizational levels.** Failing to provide information at each organizational level guarantees that the new hire will spend a great deal of time operating blind. The five organizational "levels" of onboarding include:

- Corporate level. Covering signups and corporate-wide values.
- Location level. Covering information and issues related to the country/region and the plant/facility where the new hire will be working.
- Departmental level. This level covers things related to the department the new hire is joining.
- Team/Job level. Covers things related to this person's work team and job.
- Individual level. Covers things at the team level that relate to the unique and diverse needs of this individual.

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# Updating Your Onboarding Program (Cont.)

## Top Mistakes of Onboarding Programs

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**Unidirectional information.** Most programs focus on providing information via presentations and videos. Unfortunately, this unidirectional approach lacks interaction and can make the new hire feel like a "hard drive" for receiving information. It restricts the firm's ability to understand the new hire's needs/concerns. The best programs directly ask new hires about their concerns, who they wish to meet, what they wish to learn, and how to best motivate and manage them.

6

**No metrics or accountability.** The best programs include metrics that cover time to productivity, new hire retention/termination rates, new hire error rates, and new-hire referrals. Hiring managers also need to be held accountable by including their onboarding success rates in their performance appraisals and their bonus formula.

7

**A face-to-face approach.** Many onboarding activities are provided in a live meeting. This time-consuming and expensive approach limits the new-hire's ability to access this information later, when they might actually need it. A superior approach focuses on providing standard information online, ass well as interactive forums and photos and bios of team members. In truly global corporations, the need for online information is even more critical.

8

**A lack of integration.** The best onboarding programs make a special effort to integrate and coordinate traditionally independent activities, such as benefits enrollment, payroll registration, technology set-up, security registration, business supply delivery, office assignments, new hire training, and "local" onboarding activities at the departmental level.

9

**Delays in offering onboarding.** Organizations frequently postpone most onboarding components until a large group of new hires can participate in a single session. Any delay can negatively impact new-hire productivity and provide an opportunity to make mistakes that could be difficult to erase. Effective programs offer online onboarding or do not delay onboarding beyond the first week after the employee is hired.

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# 5 Tips for Reporting Severe Injuries to OSHA

1

**Who must report severe injuries?**
All employers under OSHA jurisdiction must report to OSHA, even employers that are exempt from routinely keeping OSHA records because of company size or industry.

3

**What not to report.**
Employers are not required to report fatalities or severe injuries that:

- Are not work-related
- Are hospitalizations for observation or diagnostic testing.
- Resulted from a motor vehicle accident on a public street or highway unless in a construction work zone
- Occurred on a commercial or public transportation system
- Occurred more than 30 days after the work-related incident in the case of a fatality or more than 24 hours after the work-related incident in the case of an inpatient hospitalization, amputation, or loss of an eye.

2

**What must be reported?**
Fatalities and severe injuries must be reported. Under the rule, a severe work-related injury is a hospitalization, amputation, or loss of an eye.

**Hospitalization:** A formal admission for an inpatient service at a hospital or clinic for care or treatment. The key is hospital-provided care or treatment. Hospitalizations for observation or diagnostic testing does not need to be reported.

**Amputation:** Amputations of limbs or appendages, including fingertips with or without bone loss and medical amputations, including body parts that have since been reattached.

**Loss of an eye:** According to OSHA, loss of sight without the physical removal of the eye is not reportable under the severe injury requirements. However, loss of sight that results in the inpatient hospitalization of the worker within 24 hours of the work-related incident is reportable.

**Where do you report fatalities and severe injuries?**
Report to your OSHA Area Office either by telephone or in person. If the Area Office is closed, you can report the fatality, or severe injury using to the central OSHA 800-321-6742). You can also report online using OSHA's Serious Event Reporting Online Form.

4

**Where do you report if you are in a state plan state?**
Many states operate their own occupational safety and health programs for private sector and/or state and local government workers. Check here for the status of state plans for adopting OSHA's revised reporting requirements.

5

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# The Dollars and Cents of OSHA's Penalty Policy

On Aug. 2, 2016, OSHA issued its revised Field Operations Manual (FOM) for its enforcement employees. Increased maximum fines aren't the only new aspect of OSHA's penalty policy. Who gets the maximum (and who doesn't) under what circumstances has also changed in some situations.

**Details from the FOM:**

- The **minimum** for a **willful** violation is $8,908
- The **minimum** for a **serious** violation is $891
- **Serious** violations considered **high gravity** carry a $12,471 fine
- **Serious** violations considered **moderate gravity** carry penalties ranging from $7,126 to $10,689
- **Serious** violations considered **low gravity** carry a $5,345 fine
- OSHA Area Directors can determine that the **maximum $12,471 may be proposed** for serious and other-than-serious violations "to achieve the necessary deterrent effect," despite usual gravity-based calculations.

**New Maximums**

- $12,471 per violation for serious, other-than-serious and posting requirement violations
- $12,471 per violations per day for failure to abate violations (generally limited to 30 days maximum)
- $124,709 per violation for willful or repeat violations.

- "**Good faith**" reductions in penalties (up to 25%) are not allowed when the violation is high gravity serious, willful, or repeat
- The **only reduction** available for **repeat** violations is the one for company size

The maximum reductions for **smaller companies** are revised (company size is for all workplaces nationwide):

- 1-10 employees: 70%
- 11-25: 60%
- 26-100: 30%
- 101-250: 10%
- 251 or more: none.

**Serious willful violations** have different **maximum reductions** by company size:

- 10 or fewer employees: 80%
- 11-20: 60%
- 21-30: 50%
- 31-40: 40%
- 41-50: 30%
- 51-100: 20%
- 101-250: 10%
- 251 or more: none.

OSHA has extended a reduction for company size to the smallest employers. Previously, the maximum company size reduction for 1-25 employees was 60%. Now for those with 1-10 workers, the reduction can be as high as 70%.

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# 12 Safety Regulations with Annual Requirements

January

**Lockout/Tagout**
If you have a lockout/tagout program, OSHA requires you to review your energy control procedures at least annually to ensure that the procedure is in compliance with the standard, and that workers are following them.

February

**Annual Posting**
By February 1, all employers required to keep records of work-related injuries and illnesses must post Form 300A where notices to employees are customarily posted. The form must remain on display until April 30.

March

**Hearing Conservation**
For employers who have a hearing conservation program in place, some portions of the program have annual requirements.

April

**Bloodborne Pathogens**
For workplaces with bloodborne pathogens exposures, some parts of the program require annual review and updates.

May

**Process Safety Management**
Employers subject to the process safety management standard (29 CFR 1910.119) must review your operating procedures "as often as necessary to assure they reflect current operating practice, including changes that result from changes in process chemicals, technology, and equipment, and changes to facilities," but you must certify at least once a year that your operating procedures are current and accurate.

June

**HAZWOPER**
For employers subject to HAZWOPER rules, employees, managers, and supervisors must receive 8 hours of annual refresher training, as well as any incidents that occurred in the past year. The requirement also applies to workers in TSD operations. Specialist employees and emergency responders must receive training or demonstrate competency in their area of specialization once a year.

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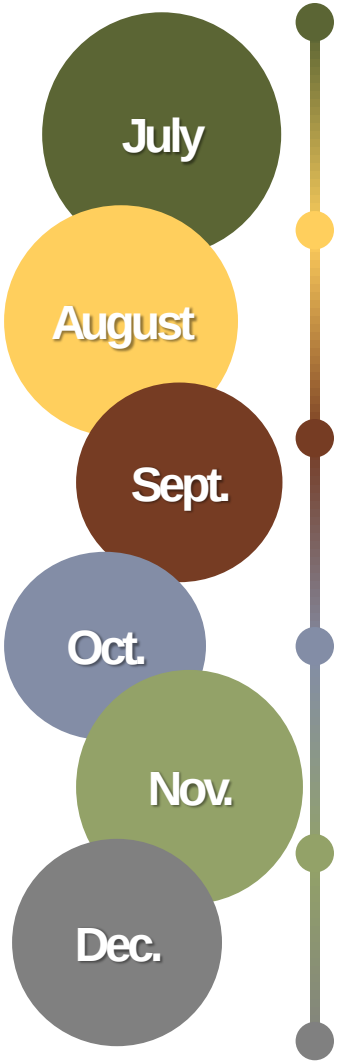


### Respiratory Protection

For workers enrolled in a respiratory protection program, the following require annual attention:

- Fit tests. For workers wearing tight-fitting face piece respirators, annual fit tests are required.
- Training. The respirator standard requires at least annual retraining.

### Permit-Required Confined Spaces

Employers who have a permit required confined space program must annually review the program, using the canceled permits, and revise the program as needed to ensure that employees are protected from permit space hazards. If no entries were conducted during the preceding 12 months, a review is not required.

### Ionizing Radiation

Employers who are required to maintain records of employee exposure to ionizing radiation must tell those employees what their individual exposure amounted to on an annual basis.

### Hazardous Chemical Exposures

Some of the hazardous chemical standards found in Subpart Z have annual requirements.

### Mechanical Power Presses

Employers whose workers operate mechanical power presses are required to conduct a safety system certification/validation prior to the initial use of any mechanical press with a PSDI mode. The design of the safety system required for the use of a press in the PSDI mode must be recertified by the employer and revalidated by an OSHA-recognized third-party validation organization annually. Operators of power presses that can operate in PSDI mode must be retrained at least annually..

### Employee Medical Exposure Records

Employers are required to keep records of employee exposures, and any medical records arising from work-related exposures.

**Click here for more information on these annual requirements.**

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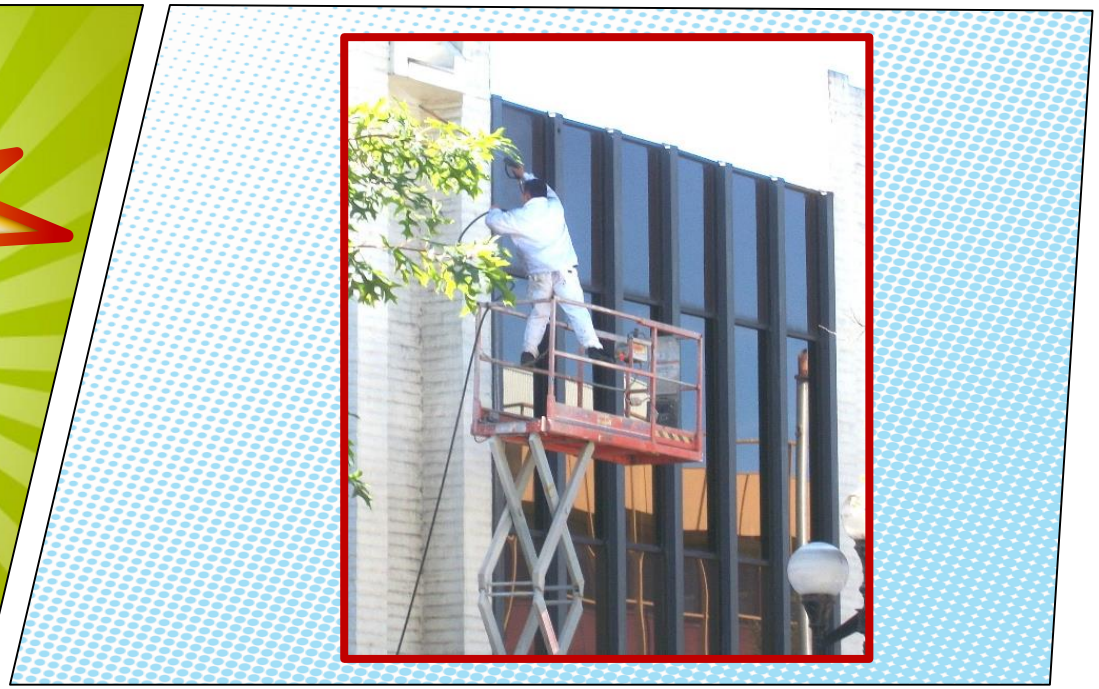
**Why is it that safety professionals are getting heckled when we provide reminders on basic safety information and then go into a facility to conduct a mock-OSHA audit and find the same type of potential hazards or non-compliance items over and over again? Each month we feature a "Captain Obvious" photo to share simple safety reminders that are found on jobsites every day.**

## CORRECTIVE ACTIONS

- **Implement effective controls that address fall protection, stabilization and positioning.**
- **Train employees to only stand on the work platform; never stand on the guardrails and keep work within easy reach.**
- **Evaluate fall protection in relation to the work being performed to determine if additional fall protection measures are warranted.**

## FINDING

**Fall Hazard – Standing on Guardrails**



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# Working Safely with Scissor Lifts

Scissor lifts are work platforms used to safely move workers vertically and to different locations in a variety of industries. Scissor lifts are different from aerial lifts because the lifting mechanism moves the work platform straight up and down using crossed beams functioning in a scissor-like fashion. Although scissor lifts present hazards similar to scaffolding when extended and stationary, using scissor lifts safely depends on considering equipment capabilities, limitations and safe practices.

Over a one-year period, OSHA investigated ten preventable fatalities and more than 20 preventable injuries resulting from a variety of incidents involving scissor lifts. OSHA's investigations found that most injuries and fatalities involving scissor lifts were the result of employers not addressing: **Fall protection**, **Stabilization**, and **Positioning**.

### How to Safely Use Scissor Lifts

Employers who use scissor lifts need to evaluate and implement effective controls that address fall protection, stabilization and positioning. Only trained workers should be allowed to use scissor lifts, and employers evaluate those workers to verify that they can use a scissor lift properly. Safe scissor lift use includes properly maintaining the equipment, following the manufacturer's instructions, providing workers training and needed personal protective equipment (PPE), and implementing safe work practices.

### Fall Protection

Scissor lifts must have guardrails installed to prevent workers from falling (see 29 CFR 1926.451(g) or 29 CFR 1910.29(a)(3)(vii)).

Employers should train workers to:

- Check to see that a guardrail system is in place before working on the scissor lift.
- Only stand on the work platform; never stand on the guardrails.
- Keep work within easy reach to avoid leaning away from the scissor lift.

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# Working Safely with Scissor Lifts (Cont.)

**Stabilization**

Employers should ensure that scissor lifts are stable and will not tip over or collapse. Some safe work practices to ensure safe, stable conditions for scissor lift use include:

- Follow the manufacturer's instructions for safe movement—this usually rules out moving the lift in an elevated position.
- Isolate the scissor lift or implement traffic control measures to ensure that other equipment cannot contact the scissor lift.
- Select work locations with firm, level surfaces away from hazards that can cause instability (e.g., drop-offs, holes, slopes, bumps, ground obstructions, or debris).
- Use the scissor lift outside only when weather conditions are good. Scissor lifts rated for outdoor use are generally limited to wind speeds below 28 miles per hour.

**Positioning**

Positioning the scissor lift to avoid crushing or electrocution hazards is important for safe use. Crushing hazards are present in workplaces using scissor lifts and may expose workers nearby, even those not working on the scissor lift. Scissor lifts present crushing hazards similar to vehicles and other mobile equipment at worksites. Employers should train workers to be watchful when:

- A moving scissor lift is near a fixed object.
- A moving vehicle and the scissor lift are operating closely.
- The scissor lift passes under a fixed object, such as a door frame or a support beam.

Positioning the scissor lift to avoid electrocution, arc flash, and thermal burns is important for safely using scissor lifts near energized power lines. Since electricity can arc or jump from the power line to the scissor lift or worker, electrocution can occur even if neither the scissor lift nor the worker touches the power line. Employers should use the following work practices to ensure that scissor lifts are safely positioned:

- Implement traffic control measures around the scissor lift to prevent other workers or vehicles from getting too close.
- Use ground guides when operating or moving the scissor lift around the workplace.
- Select work locations that do not approach electrical power sources (e.g., power lines, transformers) by at least 10 feet and that do not pose other overhead hazards (e.g., other utilities, branches, overhangs, etc.).
- If the job task requires work near an electrical source, ensure that the worker is qualified and has received the required electrical training. (29 CFR 1910.269; 29 CFR 1910.333; 29 CFR 1926 Subpart V).

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# Working Safely with Scissor Lifts (Cont.)

**Training Workers**

Employers must provide workers training on hazards, including how to work safely with or near scissor lifts. (29 CFR 1926.454). Training must, at a minimum, include:

- Manufacturer's instructions for operating the scissor lift vertically and while in transit.
- How to handle materials on the scissor lift, including weight limits.
- Other worksite hazards workers may encounter when working on a scissor lift (e.g., contact with electrical wires).
- Reporting any equipment defects or maintenance needs.

**OSHA Standards**

Employers must comply with the following OSHA standards (29 CFR) to protect workers from hazards associated with scissor lifts.

***General Industry***

•1910.23 – Guarding Floor and Wall Openings and Holes
•1910.28 – Safety Requirements for Scaffolding (Many scissor lifts are covered under OSHA's Scaffolding standard)
•1910.29 – Manually Propelled Mobile Ladder Stands and Scaffolds (Towers)
•1910.333 – Selection and Use of Work Practices

***Construction***

•1926.21 – Safety Training and Education
•1926.451 – General Requirements
•1926.452 – Additional Requirements to Specific Types of Scaffolds
•1926.454 – Training Requirements

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**Contact Monica Meyer at Monica.Meyer@ehs-support.com today to learn more about how we can help you manage your health and safety risks.**