

TOGETHER, *WE'RE BETTER SAFE THAN SORRY*

Above all else, our goal is to ensure our associates work in a safe environment, and we believe our ability to provide a safe environment is the direct result of working with clients who value the formation of safety partnerships. As safety partners, we work together to guarantee shared employees have access to and are provided with adequate safety training and personal protective equipment (PPE), regardless of the length of an assignment and to at least the same degree as permanent employees working in the same position.

WHY IS THIS SO IMPORTANT?

In 2013, following on the heels of Workers' Memorial Day, the Occupational Safety and Health Administration (OSHA) partnered with the American Staffing Association to launch an initiative focused directly on further protecting temporary employees from workplace hazards. Over the past two years, this partnership has made great headway in creating and disseminating information, making it easier for staffing firms and their clients ("host employers") to understand their respective roles in creating safe work environments.

Though every instance is unique, there are general best practices we as staffing firms and host employers can follow to ensure we both meet responsibilities set forth by OSHA. In short, no single entity or person is responsible for the safety of a worksite, a workstation, or an individual; safety is always a collaboration between parties.

We feel it's important to review these best practices regularly with potential and existing clients to spark discussion, share knowledge, incite change, and—most importantly—continue to make workplaces safer.

WORKSITE ASSESSMENT

The very first step in forming a safety partnership starts with a worksite assessment, a joint venture between the staffing firm and host employer prior to forming a business partnership. During a worksite assessment, a representative from the staffing firm visits the host employer's facility to observe the environment temporary associates will be placed within and complete a written site assessment. The two parties work together to identify the breadth and depth of safety training and PPE offered by the host employer and identify gaps necessary to meet OSHA standards and keep employees safe. This is a great opportunity for both parties to make sure temporary associates will have the same initial and continued training and PPE as full-time employees and to jointly review training processes and PPE to make sure the right program and equipment is being utilized.

In addition to this initial worksite assessment, many staffing firms—Elwood included—perform follow-up worksite assessments for the duration of associates' assignments. We train our staff to visit the worksite and complete a written evaluation at least quarterly.

OUTLINING RESPONSIBILITIES

For both parties' protection, responsibilities for all levels of safety training and provision of PPE should be clearly delineated on the written site inspection or in an agreement based on information gathered during the worksite evaluation. Not only does this help protect both entities in the event of an investigation, but it also aids in creating a seamless onboarding and training process for new temporary associates. A good rule of thumb is that a staffing agency should be responsible for no more than a general safety overview, while the host employer should assume responsibility for providing site- and task-specific training—the exact (or equivalent) training provided to permanent employees performing the same duties.

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Here are a few very important responsibilities to designate:

- The type of general safety training the staffing firm will provide, if any, during its onboarding process
- The type of general and/or site- or task-specific training the host employer will provide, if any, during its onboarding process
- The types of PPE, if any, required for each position and who will provide it. It's important to note that an employee cannot be required to provide his or her own PPE as a condition of employment, nor can he or she have the expense deducted from wages.¹
- The process for sharing and recording information about temporary employee incidents, injuries, or illnesses

ONBOARDING & TRAINING

According to OSHA, both the staffing provider and host employer should provide some level of health and safety training, whether done separately or jointly. The training needs to be identical or equivalent to the training given to the host employer's permanent workforce, and it must be in a language the workers understand. Temporary associates should also receive clear instruction on how to report incidents, injuries, or illnesses. It is important to note that OSHA maintains a stance that the host employer cannot, by nature of their supervisory role, transfer completely the responsibility for safety training onto the staffing provider.

As a general practice, Elwood approaches training in the same general manner supported by OSHA. We believe our clients are in the best position to provide site- and task-specific training to our associates, while we assume responsibility for general chemical hazard training and PPE identification applicable to a vast array of occupational settings. As part of our standard onboarding process, we train and assess every associate on the Globally Harmonized System of Classification and Labeling of Chemicals, to ensure each individual understands how to identify and interpret common workplace hazards. Additionally, we provide a general overview of the major classes of PPE and the typical environment in which each piece of equipment is used. In some cases, and by specific request, we can provide video overview of general safety practices in light-industrial facilities.

We strongly suggest our clients include temporary associates in the same training sessions as permanent employees, namely to reduce the risk that temporary workers receive a lesser degree of instruction. Not only does this practice eliminate training inconsistencies, it immediately fosters a culture of shared responsibility and introduces a sense of camaraderie between permanent and temporary employees.

CHANGES TO ASSIGNMENTS

Any change to an associate's assignment needs to be immediately shared with and approved by the staffing agency so both organizations can work together to perform a new worksite evaluation, reassess training requirements, and dole out appropriate PPE. Our Associate Handbook instructs associates to notify us of any change to their duties, but we also require our client representatives to reach out to us and request permission prior to making a change. Again, this helps protect all parties in the event of an investigation, as it triggers a preemptive review of and potential provision of new training and PPE.

WHY IS THIS SO IMPORTANT—NOW?

Safety is always important, period. But, because there are seasonal trends to turnover, you should review, update, and/or change your safety training and PPE practices in preparation. As an inherent function of fluctuating

¹There are very specific exceptions to this rule. To see the list of PPE and the circumstances under which the employer is not required to provide it, refer to OSHA regulations 29 CFR 1910.132(h) and 29 CFR 1926.95(d).

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contingent workforce needs, temporary associates are often overlooked or neglected as safety practices and/or PPE requirements change. Because both hiring needs and turnover tend to spike at the end of Q2, now is the perfect time to start your annual review process, ensure you and your staffing partner are following the same safety guidelines for all positions, and prepare for both the inevitable rise in departures and the new faces that will enter your doors in the spring and summer.

FOR MORE INFORMATION, CONTACT YOUR LOCAL ELWOOD STAFFING REPRESENTATIVE AND VISIT www.osha.gov/temp_workers.

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