

Element 4: Inspection of Premises, Equipment, Workplaces and Work Practices

Overview

Regular inspection of the premises, equipment, work methods and work practices must be included in an effective health and safety program. The audit checks for the following:

- written instructions that specify:
 - the intent of inspections
 - who is to inspect (including worker representation from the health and safety committee)
 - what is to be inspected
 - inspection frequency
- records of regular inspections carried out as outlined in the written instructions by designated personnel
- a system to ensure that unsafe or harmful conditions and work procedures are identified, reported, corrected and followed up without delay
- whether adequate training is provided for personnel responsible for inspection.

This is an element where informal documentation, such as manager notebooks, can be very useful in showing that inspections have occurred and that the journal's owner participated. Inspecting the work practices (i.e., observing workers doing their normal tasks) is the most overlooked and most important part of the inspection process. The overloaded cart with the bent wheel won't hurt anyone until someone tries to use it. More likely it won't even be noticed until it is seen in use.

Key Concepts and Implementation Tips

In order to meet the above objectives, the audit checks whether:

- The employer has a written inspection policy that describes all the different types of inspections that are performed, including
 - Joint Occupational Health & Safety Committee monthly inspections
 - annual inspections of fire and life safety equipment and elevating devices
 - routine tours by management and supervisors of the facility or work area
 - daily equipment inspections by workers
 - inspection of critical equipment prior to use
 - utility and food-related inspections as required by regulation.
- The inspections required in the policy, regulation and law are actually being done by the appropriate people.
- When problems are found, they are fixed properly in a reasonable time

- There is a method for workers to mark and report problem tools and equipment when discovered during their duties, so that no one is subsequently hurt by that tool or equipment.
- Training is documented.

SUPPORTING RESOURCES:		
How to – Inspections		
Safety Inspections (WorkSafeBC)	http://www.worksafebc.com/publication/s/health_and_safety/by_topic/assets/pdf/safety_inspections.pdf	
Effective Workplace Inspections(CCOHS)	http://www.ccohs.ca/oshanswers/prevention/effectiv.html	
How to Conduct workplace Inspections (IAPA)	http://www.iapa.ca/pdf/inspect.pdf	
How to Implement a Formal Health and Safety Program (WorkSafeBC)	http://www.worksafebc.com/publication/s/health_and_safety/by_topic/assets/pdf/howtoimplement_ohs.pdf	

TRAINING OPTIONS:	
Training – Inspections	
Employers' Advisers Office	http://www.labour.gov.bc.ca/eao/
WorkSafeBC database of training providers	http://www.ohstrainingbc.com/
CCOHS	http://www.ccohs.ca/products/courses/workplace_insp/

RELEVANT REGULATION AND LEGISLATION:		
<p>Occupational Health and Safety Regulation (WorkSafeBC)</p> <p>Note that this list of inspection regulations is a partial list of items most likely to be applicable to the hospitality industry. It is NOT a comprehensive list of every inspection required for every company.</p>	<p>http://www2.worksafebc.com/publications/OHSRegulation/Home.asp</p>	<p>Inspections</p> <p>General</p> <ul style="list-style-type: none"> • Sections 3.5-3.10 • Section 4.3 (2) • Section 4.9 <p>PPE</p> <ul style="list-style-type: none"> • Section 8.5 <p>Confined Space</p> <ul style="list-style-type: none"> • Section 9.7 • Section 9.24 <p>Fall Protection</p> <ul style="list-style-type: none"> • Section 11.9 <p>Laundry</p> <ul style="list-style-type: none"> • Section 12.150 <p>Work platforms</p> <ul style="list-style-type: none"> • Section 13.22 <p>Cranes and lifting machines</p> <ul style="list-style-type: none"> • Section 14.12-14.14 <p>Mobile Equipment</p> <ul style="list-style-type: none"> • Section 16.7 • Section 16.34 <p>ATV's</p> <ul style="list-style-type: none"> • Section 16.53 <p>Transporting workers</p> <ul style="list-style-type: none"> • Section 17.2 • Section 17.24 <p>Emergency equipment Section 32.5</p>

Guidelines for Using the COR Audit Tool

QUESTION 4.1

Is there a written policy/procedure for inspections?

Auditor Guideline

- Review documentation (inspection policy/procedure) to ensure it identifies who, what, and when inspections of premises, equipment, workplaces, and work practices are to be performed.

Employer Guideline

- This requires a policy or a procedure that outlines:
 - What is to be inspected? Have checklists been created for each area, and do they specifically mention premises, equipment, workplaces and worker observations?

- Who performs inspections? Perhaps the JOHSC goes out in teams, or the manager is responsible, or the safety coordinator, etc.
- How often are the inspections to be done? (Monthly, quarterly, before every shift, before a piece of equipment is used?)
- How are they conducted? (Formally or informally, scheduled or random, focusing on improvements rather than assigning blame?)
- The company policy should incorporate actual company practices, whereby managers tour the operations and individual workers inspect their work area on an ongoing basis, in addition to the JOHSC inspections.

Types of Documentation to Review

- A formal policy or procedure is required, and it must mesh with other parts of the overall safety management system, such as investigation and discipline.

QUESTION 4.2

Are inspections being performed as per the inspection policy / procedure?

Auditor Guideline

- Review documentation (inspection records). Inspections may be done according to a formal or informal schedule.
- Interview Employees to ensure inspections are occurring as per the policy / procedure.

Employer Guideline

- This question checks whether the company has documentation proving that the inspections are occurring following the rules that the policy and Regulation set out. For example, if the policy states that inspections will be done monthly in each department, and only 60 per cent have met that requirement, the question will be scored as 6 out of 10. However, if the company system does not meet regulatory requirements, this is a negative finding. For example, if the company system says that fall protection equipment is to be inspected monthly — whereas the regulatory requirement is to inspect it before every use — then documentation evidence is negative. The auditor’s interview tests employee knowledge of the expected frequency of inspections, and the auditor must conclude that the inspections are being completed properly. The interview is negative if, to continue the example, the workers state that the fall protection equipment is inspected monthly, even though that may be the company’s instruction. Evidence of non-compliance can never be a positive finding for any audit question.

Types of Documentation to Review

- A selection of inspection records needs to be reviewed. These should reflect different types of inspections and also include inspections that the company should perform by regulation but do not actually perform (if any exist). Supervisor/manager journals are often examined to show management’s inspection.

QUESTION 4.3

Do the individuals identified in the policy participate in the inspection process?

Auditor Guideline

- Review documentation to verify involvement in the inspection process.

Employer Guideline

- This question compares names on the inspection sheet or record with whoever the policy lists as responsible for the inspections. Note that JOHSC or worker representative is required to participate in monthly inspections as per OHS Regulation.

Types of Documentation to Review

- This continues from the previous question.

QUESTION 4.4

Is there a system to ensure that unsafe or harmful conditions and work procedures are corrected, and followed up without delay? Is the system being followed?

Auditor Guideline

- Review documentation (JOHSC meeting minutes, maintenance records, etc) to ensure there is a system.
- Observe corrective action from a sample of completed current inspection records during the site tour.

Employer Guideline

- The company needs to demonstrate a systematic corrective action plan for items identified during the inspection (and from employee reports or supervisor observations). The plan needs to specify:
 - what needs to happen
 - who is required to either lead or perform the plan
 - what the deadline is
 - the date on which it was completed.
- This action plan can be tracked in the JOHSC meeting minutes, through a maintenance program or in a corrective action log. The audit tests the system to see whether items are being corrected and followed up on in a timely manner. During the documentation review, an auditor will note a few of the corrective actions that are said to be complete –and the auditor should be able to see something tangible that can be checked – and will look to see whether the items have been completed as stated during the observation tour.

QUESTION 4.5

Are the individuals performing inspections trained to do them?

Auditor Guideline

- Review documentation (training records) and verify if formal or informal inspection training has occurred.

Employer Guideline

- This requires a tracking system for completed training. The training can be done in house, but it needs to be documented. This can be shown with a spreadsheet, training records in employee files, a certificate, or a PowerPoint presentation with the sign-in sheet indicating who attended, etc. Workers should be trained in the inspection of their work areas as part of their regular duties, using their regular training procedures.

QUESTION 4.6

Is there a system for preventing the use of defective /broken tools and equipment until it is repaired or replaced? Is it being followed?

Auditor Guideline

- Review documentation (JOHSC minutes, maintenance records, etc) to verify the system is in place and being followed.
- Observe and verify during site tour by looking at condition/ repair of a sample of items.
- Interview Supervisors and Workers to ensure a system is in place.

Employer Guideline

- This is usually a policy or procedure outlining the steps to take if a piece of equipment breaks down and needs to be repaired or replaced. The procedure might incorporate some kind of lock-out, removal or flagging system that clearly identifies to everyone items that are not safe to use. During the observation tour, auditors verify that this system is being followed according to the policy. Auditor interviews verify that supervisors and workers are aware of the system and know how to prevent co-workers from using defective or broken equipment.