

6 Steps to Proper Auditing

Tips from David Regelbrugge, Senior Manager at Environ

1. Initial research

Prior to arriving on site, the auditor must decide whether to run a formal or informal audit. Companies that prefer informal want to do it quicker and at a less expense, Regelbrugge says. A formal assessment requires an audit form from either the company or OSHA's 18001. Although comprehensive and time-consuming, this process is efficient. An informal approach requires a very experienced auditor. This is a walkthrough inspection where the auditor identifies deficiencies that occur.

Initial research also includes sending a pre-audit questionnaire. This can be a summary of the items to be reviewed or it may include sending the audit in its entirety. "The main purpose of the pre-audit questionnaire is to help the facility prepare for the audit, not correct deficiencies," Regelbrugge says. Sending the questionnaire ensures that the facility has the programs, policies and procedures ready for review when the auditor arrives, saving a tremendous amount of time. "One of the questions may ask for the facility's Emergency Response Plan, another may ask about the facility's lockout tag out procedures," he says. "Anything more is likely to overwhelm the facility and guarantee a poor start."

Regelbrugge recommends looking at the company's web site and reviewing data on the facility prior to arriving, as well as reviewing OSHA statistics to identify past concerns. This can be done through www.osha.gov/oshstats/index.html.

2. Opening meeting and walkthrough

"This is a very important process because one of the things that you need to take into any opening meeting is that most companies aren't happy to have an audit performed at their facility," says Regelbrugge, adding that a key goal is to become familiar with the people and processes. During the opening meeting, it is important for the auditor to stress that he or she is there to help and not to point fingers. Emphasize that the underlying purpose of this inspection is to protect employees and the environment. "I also point out that it is better for the auditor to identify concerns than a government agency where citations may be involved. This is a time where the auditor can offer to assist with corrective actions or at least be a resource for the facility."

When performing the walkthrough, check for general conditions and cleanliness. Check to make sure protective gear is being worn if necessary and that proper signage exists throughout the building. This is not a full-fledged walkthrough but take notes to get an idea of problem areas, he adds.

3. Review written programs and records

Reviewing the OSHA 300 Log/300A is one of the most vital steps because it contains information on serious accidents and injuries that have occurred at the facility. Review the last five years of injuries, looking for excess injuries like serious cuts, as well as cumulative trauma disorders (CDTs) like sprains and strains. Review insurance claims, first-aid logs and accident investigation forms if available. Then see what written programs or plans are in place and which ones must be added. Almost every employer needs an emergency action plan and a hazard communication plan with proper training, he says. Other

plans include a fire protection plan, a respiratory protection plan, a spill response plan and a confined space program.

4. Detailed walkthrough

During your detailed walkthrough, housekeeping, exits, electrical wires, fall protection, stairs and ladders, are just a few of the areas that need to be checked for unsafe conditions. Walkways and exits should be clean, dry and cleared so that employees can move about the workplace safely. Electrical equipment should be protected by a fence or wall with visible warning signs present. Electrical wiring should not be exposed and extension cords should be intact to the ground and splice-free. Floor openings and platforms must be guarded by either railings or a fall restraint system. Stairs must be stable with handrails and kept clean and dry. An emergency escape stairwell should not be used for storage. Ladders should be permanently attached with clean, sturdy rungs. "Unsafe acts are infinite," Regelbrugge says. "Human behavior can be unpredictable so be on the lookout at all times."

In addition, there may be times where auditors and employees need to interact. "If respirators are used in the workplace the auditor may have to question employees about the handling, cleaning and storage of this equipment. However, employee involvement in safety at the facility is usually apparent through other avenues." These include audit questions pertaining to safety committees, accident investigations and training.

5. Review findings

In the closing conference, the auditor should view the significant findings. "This doesn't mean that each individual item need to be gone over line by line but items that are going to result in significant time or costs or could be seen as systemic must be reviewed," Regelbrugge says. The facility should not be surprised by any of the findings when the final report arrives. In addition, the facility should have very little input on the final report. A corporate attorney can review the report from a legal standpoint but the auditor should not allow anyone to significantly change or hide any findings, he adds.

6. Follow-up

Follow up with the facility after the written report has been issued. There are many ways to monitor audit follow-up procedures. The simplest is to include a column or columns related to the follow-up on the written audit itself. "These columns might include who has been assigned the responsibility for correcting the item, the date that the item is expected to be corrected by and verification by another person that the items have indeed been corrected," Regelbrugge says. For companies with multiple locations or an international presence, the same type of follow-up is performed but it is best tracked via Internet or intranet tracking system. Some of the auditing software available has the ability to do this type of tracking.

More often than not, workplace injuries and citations come from minor issues that would have been picked up during a normal audit, Regelbrugge says. Effective auditing protects both the employees and the business by reducing injuries and citations, and thus reducing operating costs. "Best of all, everyone goes home healthy."