

A man in a blue dress shirt and yellow tie is standing in a classroom, pointing towards a screen. He is smiling and appears to be presenting. In the foreground, the backs of several audience members' heads are visible, showing they are seated and listening. The screen behind him displays some text, though it is partially obscured by the large title text.

The Ultimate
**SAFETY
TRAINING
PROGRAM**

Audit

Steve Geigle
MA, CET, CSHM

A comprehensive audit to help your organization meet consensus standards in safety, health and environmental training.

PREVIEW

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The Ultimate Safety Training Program Audit

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INTRODUCTION

Companies, and the individuals who run them, are more pressed for time and resources than ever before. Whether a business is small or large, companies are constantly pulled in multiple directions, making it difficult to prioritize where funds and efforts should be devoted.

The Production Department always needs more materials, labor, and machinery to continue company operations. Research and Development is always asking for a larger budget to explore newer, better, and faster processes to create the products your clients need. And, of course, Marketing consistently requests more money be invested in attaining and retaining customers. All the while, the folks in the Accounting and Finance Department raise their hands in unison and proclaim, “You don’t have the money!”

It sounds exhausting, doesn’t it? But smaller businesses can be even more strung out. In these companies, it’s not uncommon to see individuals performing five job functions and their bosses asking them to perform a sixth because they simply do not have the human capital available to get everything done.

In the midst of all the chaos, excitement, and intricacies that come along with running a business, it is essential for individuals—whether it’s the CEO, managers, supervisors, or employees—to not overlook the importance of occupational safety and health. Because, in reality, if workplace safety is lacking, all other aspects of a business are sure to be found suffering as well.

There are many key components to a successful occupational safety and health function within an organization. For a **safety management system (SMS)** to be effective, the following are critical:

1. Commitment and Leadership
2. Accountability
3. Safety Involvement
4. Safety Communications
5. Hazard Identification and Control
6. Accident Investigation
7. Education and Training
8. Continuous Improvement

The Ultimate Safety Training Program Audit focuses primarily on the Education and Training element of the safety management system, although it also discusses important concepts regarding Commitment and Leadership, Accountability, and Continuous Improvement as they relate to safety training.

One may ask, why the focus on safety training?

There are several reasons. First, developing and maintaining an effective safety training program is the ethical thing to do. All individuals within an organization have a right to a safe workplace. Companies should be consistently training workers how to perform work in a safe manner and providing information about the hazards that exist in the workplace. Workers who have not been trained to perform their job safely are more likely to be injured.

Second, the Occupational Safety and Health Act, or **OSH Act**, requires employers to provide safety and health training. No matter how swamped businesses may be, companies still must adhere to the **Occupational Safety and Health Administration's (OSHA)** safety training requirements or risk being faced with financial and legal penalties.

Third, if a company wants to be sustainable—or, in other words, SURVIVE—in the long run, the right investments must be made. Investing in employees and their safety is always a good business practice. The return on that investment is worth it and helps you avoid costly legal fees, worker compensation costs, and other indirect cost associated with injuries, illnesses, and fatalities. To be exact, investing in safety training can help lower the costs of doing business.

In establishing a safety training program, employers must clearly identify the employees to be trained, the subjects to be covered, and the goals and objectives they wish to achieve. The learning goals or objectives should be written in clear, measurable terms before the training begins. These goals and objectives need to be tailored to each of the specific training modules or segments. Employers should describe the important actions and conditions under which the employee will demonstrate competence or knowledge as well as what is acceptable performance.

Hands-on training, where employees apply lessons learned in simulated or real situations, will enhance learning. For example, operating personnel, who will work in a control room or at control panels, would benefit by being trained at a simulated control panel. Upset conditions of various types could be displayed on the simulator, and then the employee could go through the proper operating procedures to bring the simulator panel back to the normal operating parameters. A training environment should be created to help the trainee feel the full reality of the situation but under controlled conditions. This type of realistic training can be very effective in teaching employees correct procedures while allowing them also to see the consequences of what might happen if they do not follow established operating procedures. Other training techniques using videos or computer-based training (CBT) also can be very effective for teaching other job tasks, duties, or imparting other important information. An effective training program will allow employees to participate fully in the training process and to practice their skills or knowledge.

Employers need to evaluate periodically their training programs to see if the necessary skills, knowledge, and routines are being properly understood and implemented by their trained employees. The methods for evaluating the training should be developed along with the training program goals and objectives.

Training program evaluation will help employers to determine the amount of training their employees understood and whether the desired results are obtained. If, after the evaluation, it appears the trained employees are not at the expected level of knowledge and skill, the employer should revise the training program, provide retraining, or provide more frequent refresher training sessions until the deficiency is resolved. Those who conducted the training and those who received the training also should be consulted as to how best to improve the training process. If there is a language barrier, the language known to the trainees should be used to reinforce the training messages and information.

Careful consideration must be given to ensure that employees, including maintenance and contract employees, receive current and updated training. For example, if changes are made to a process, affected employees must be trained in the changes and understand the effects of the changes on their job tasks. Additionally, as already discussed, the evaluation of the employee's absorption of training will certainly determine the need for further training.

The Ultimate Safety Training Program Audit contains more than 200 critical points of measurement addressing standard requirements and explanatory information that aligns with:

- OSHA Publication 2254, Training Requirements in OSHA Standards and Training Guidelines
- OSHA Publication 3133, Process Safety Management Guidelines for Compliance
- ANSI/AIHA Z490.1-2016, American National Standard Criteria for Accepted Practices in Safety, Health, and Environmental Training
- Designing and Delivering Effective Training, National Environmental Safety and Health Training Association (NESHTA)

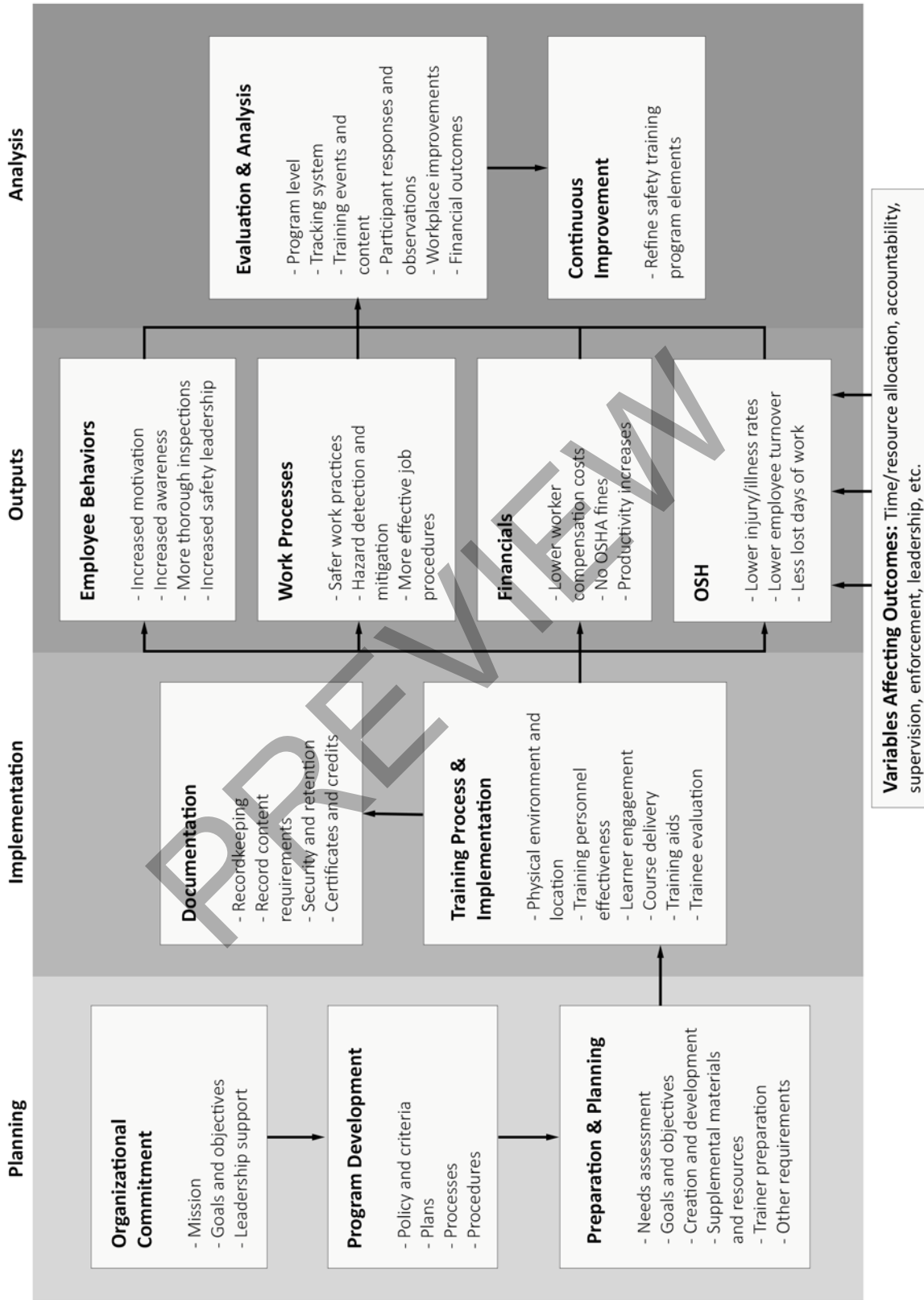
It is recommended you review the documents and standards above in conjunction with this audit. For more information on purchasing the consensus standard visit the ANSI website (www.ansi.org), ASSE website (www.asse.org), NESHTA website (www.neshta.org), and the OSHA website (www.osha.gov).

i THROUGHOUT THE DOCUMENT, BOLDED WORDS INDICATE A DEFINITION IS INCLUDED IN THE GLOSSARY.

SAFETY TRAINING PROGRAM FRAMEWORK

The safety training program framework in this audit is a graphical representation of how an organization can think about the safety training program and how the various components of a comprehensive safety training program fit together.

Safety Training Program Framework



The framework is divided into four sections, or phases:

1. Planning Phase
2. Implementation Phase
3. Outputs Phase
4. Analysis Phase

Each phase contains various components that relate to that phase. Phase components are discussed thoroughly in this audit and contain the various audit questions associated with that component.

Though the framework is presented in a somewhat linear fashion, it is important to note that the process of developing, implementing and improving a safety training program is actually cyclical in nature. The various phases and phase components will and should be revisited time and again at various points in time. This allows an organization to revise and improve when needed.

PLANNING PHASE

The Planning Phase is characterized by management making safety a priority by embedding it into an organization's value system, including a company mission, goals, and leadership beliefs. Once organizational support exists, the development of an actual safety program naturally follows. An effective program will include written policies, plans, processes and procedures surrounding occupational safety and health training. With that as a backbone, the planning and preparation of actual training events and courses can take place.

IMPLEMENTATION PHASE

Once training has been prepared, it is then time for a company to implement the training by scheduling and conducting a training course or event. This occurs in the Implementation Phase. As is discussed in the safety training program framework graphic and in the appropriate sections of this audit, it is important the learning environment, trainer effectiveness, learner engagement, course delivery methods, training aids, and trainee evaluation be optimized and evaluated. After training has been conducted, one key output that should be included in any safety training program is training documentation. Other potential outputs that should naturally follow an effective safety training program are discussed in the next phase.

OUTPUTS PHASE

The Outputs Phase can be thought of as the consequences that follow a safety training event or course. If the training is effective, an organization should see positive employee behaviors, improved work processes, optimal financials, and other safety improvements. These are the main outputs discussed in this audit, though a company may realize other positive results after conducting safety training. The

framework does incorporate and consider the fact that other variables and conditions exist that may affect the realization of positive outputs. For example, a safety training event may be effective in its content, delivery, and evaluation; however, if employees aren't given the resources (e.g., personal protective equipment) to carry out what they learn, then an organization may not see lasting improvements or results.

ANALYSIS PHASE

During the Analysis Phase, it is important to evaluate the safety training program itself, keep track of safety data, analyze feedback from participants and trainers, and review the various outputs and outcomes discovered in the Outputs Phase. Once a comprehensive evaluation has taken place, an organization should continuously seek to improve the components of the safety training program, courses, and outcomes that were found to be lacking.

PREVIEW

INSTRUCTIONS

Conducting the Audit

Audit Questions

Read through all of the audit questions before beginning to become familiar with the topic areas that will be covered. Knowing what the topic areas are before beginning the audit will help you plan ahead so you are prepared. As you pre-read the questions, consider taking notes or highlighting anything that is particularly important to your situation.

When you are ready to begin the audit process, you may find it helpful to have a copy of the instructions, domains, and rating system handy in case you need to refer to them along the way.

The Five Domains

This audit evaluates the training program by focusing on five “domains.” Domain, as used in this audit, is a specific sphere of activity or area being analyzed. Familiarize yourself with each of the five domains before you begin the audit. You will use the various methods to gather information within each domain.

The Numerical Rating System

Based on your conclusions after analyzing each domain, you will evaluate the domain by assigning it a value using a 0, 1, 3, and 5 point rating system. You will enter the rating in each of the five domain columns. In some cases, one or multiple domains may not be applicable to the question, in which case you should enter “NA” as the value.

After assigning a rating to each of the five domains, you will calculate and enter an average rating or overall score for the question. High or low ratings should include justifications in the comments area.

The Five Domains

Analyze each of the following five domains to develop a justification for the rating.

Knowledge

Analyze what employees are thinking by conducting surveys and interviews. Do employees have full knowledge, positive attitudes, etc.? High trust and low fear indicate effectiveness. Thoughts are the most direct leading indicator of the effectiveness of a training program.

Behaviors

Observe both employee and manager behaviors and activities. Are they consistent and appropriate? Do they reflect effective safety education and training? Behaviors constitute the next most direct leading indicator of a training program.

Conditions

Inspect the workplace for hazards that might indicate the effectiveness of training. The absence of hazards indicates effectiveness. Behaviors cause conditions in the workplace; hence, they are the next most direct leading indicator of a training program.

Standards

Analyze policies, plans, programs, budgets, processes, procedures, practices, appraisals, job descriptions, rules, etc. Are they informative and directive? Are they clearly and concisely communicated?

Results

Analyze employee performance and training records that validate knowledge, skills and abilities (KSAs) are effectively applied in the workplace. As you repeat this audit over time, continually improving results indicates program effectiveness.

The Rating System

Use the following rating system guidelines to evaluate each of the five domains. Enter a numeric (0, 1, 3, or 5) score under each of the five domain columns (K, B, C, S, and R) for every audit question that applies to your situation. Use the following guidelines for your ratings.

- Each numeric rating score should be understood as containing all of the positive factors included in the lower rating scores. For example, a rating of “5” should include all of the positive factors indicated in a “1” and “3” rating.
- The descriptors in each rating illustrate the conditions that should exist in the workplace to justify the score. In exercising your professional judgment, proceed with the understanding that the descriptor that "best fits" will not necessarily match the workplace exactly or in literal detail.

RATING SCALE AND CRITERIA

0 = Not Present

Analysis indicates the condition, behavior, or action described in this statement does not exist or occur.

1 = Partially Met

Analysis indicates the condition, behavior, or action is partially met. Application is most likely too inadequate to be effective. Workplace conditions, if applicable, indicate improvement is needed in this area. Employees lack adequate knowledge and express generally negative attitudes. Mistrust may exist between management and labor. Employees and managers fail to comply adequately or fulfill their accountabilities. Safety policies and standards may not be clear, concise, fair, informative and directive. Results in this area are inconsistent, negative, and does not reflect continual improvement.

3 = Mostly Met

Analysis indicates the condition, behavior, or action described is adequate, but there is still room for improvement. Workplace conditions, if applicable, indicate compliance in this area. Employees have adequate knowledge and express generally positive attitudes. Some degree of trust between management and labor exists. Employees and managers comply with standards. Leadership is adequate in this area. Safety policies and standards are in place and are generally clear, concise, fair, informative and directive. Results in this area are consistently positive, but may not reflect continual improvement.

5 = Fully Met

Analysis indicates the condition, behavior, or action described is fully met and effectively applied. There is room for continuous improvement, but workplace conditions and behaviors indicate effective application. Employees have full knowledge and express positive attitudes. Employees and managers not only comply, but exceed expectations. Effective leadership is emphasized and exercised. Safety policies and standards are clear, concise, fair, informative and directive, communicating commitment to everyone. Results in this area reflect continual improvement is occurring. This area is fully integrated into line management. Supervisors and managers demonstrate safety leadership by example. Working safely is considered a non-negotiable production/service value.

NA = Not Applicable

If a domain does not apply to a question, you can enter "NA" instead of a numeric value to show it is not applicable. As you pre-read the audit questions, take note of any you think are not applicable. Consider discussing these domains with your audit or safety team to be certain they don't apply to your situation. It's okay to mark a domain as "NA," but only if it is truly not applicable.

Do not include any domains marked as “NA” in your overall calculation. For example, when calculating the average score for a question, if you and your safety team determine the knowledge (k) domain is not relevant to the question, you would add the applicable scores together and divide by four instead of five.

Calculate the Average Score for the Question

Add up the scores for each of the applicable domains and calculate the average score for that question. Enter the average score for the question under the overall column. This score will give you a good numerical indication of the progress made thus far related to the question.

EXAMPLE 1

Audit Questions	K	B	C	S	R	Overall
a. Is the safety training program integrated into an overall safety management system (SMS)?	1	3	5	5	3	3.4

EXAMPLE 2

Audit Questions	K	B	C	S	R	Overall
a. Is the safety training program integrated into an overall safety management system (SMS)?	3	3	3	5	3	3.4

In these examples, each overall score totals up to 17. The average score for the question is $17 \div 5 = 3.4$. This score would tell you, overall, the criteria for this question is mostly met, but still needs additional work.

When evaluating your scores, you might find it helpful to also include a note about the range of scores for each question. For example, the range of scores for the first example above is 1 to 5. Compare this to the range of scores in the second example above, which is 3 to 5. Even though the averages are the same, the range highlights the lower score in the first example.

Develop Summary and Recommendations for Each Category

Use the information gathered to develop an evaluation summary that justifies the rating for each of the five domains. An action plan would be entered into the “Comments” section.

Finally, offer recommendations for improvement. Include draft improvements to policies, programs, plans, processes, procedures, practices, training, forms, reports, records, and other documents.

PREVIEW

1. ORGANIZATIONAL COMMITMENT

If the safety training program is not a priority at the top of an organization, the safety training program will likely be ineffective. Even if **safety trainers** and managers emphasize working in a safe manner and do all they can to ensure employees are aware of workplace hazards, it will be difficult to instill a commitment to safety without the funding and resources upper-management can and should provide.

Typically, the level of organizational commitment to the safety training program can be determined by the following:

- The context within which the safety training program is viewed. Forward-thinking organizations that place a high value on the safety of employees have safety embedded into the company **mission, vision, objectives, goals, and/or values**. The safety training program is integrated on a company-wide level and into an overall safety management system (SMS).
- The level of management support. Written and verbal support to the safety training program are important. However, action-based and financial support are even more powerful, as it shows true commitment and belief in a safety training program.
- Top-level managers believe they are responsible for, and hold themselves accountable to, the success of the safety training program.

Reviewing the company website, business plan, company-wide broadcasts, internal marketing collateral, and the safety management system overall may be helpful sources of information when answering the audit questions in this section.

When workplace safety and workplace safety training become a framework or context within which a company's strategies and operations are carried out, that company and top management are more likely to demonstrate a higher level of commitment. This commitment then filters through to all the components of an organization and its safety training program.

1.1 Operational Context

Audit Questions	K	B	C	S	R	Overall
a. Is safety integrated into the company’s mission and/or vision?						
b. Are company-wide goals and objectives formulated to improve workplace safety training and enhance employee safety overall?						
c. Does the company explicitly, both in writing and verbally, value workplace safety training?						
d. Is the safety training program integrated into an overall safety management system (SMS)?						

Comments: _____
