Safety Audits
Comparing Three Types of Assessments

By
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Safety audits and assessments are essential elements of good management. The ability to identify program strengths and weaknesses and rate an organization's total safety and health program is key to continual improvement and success. This entails not only identifying opportunities for improvement, but also creating processes and procedures to mitigate future risks and losses.

In addition to assessing conformance to safe work practices and conditions, audits measure senior management's safety philosophy and attitude. Typically, the three types of safety audits are compliance, program and management system audits.

Compliance Audit

A safety audit based on regulatory or other compliance can help determine whether the company is providing a safe and healthful workplace. There are typically two levels of compliance-type audits. The first (or basic) level is a department- or equipment-specific inspection. This level also may include behavior observations. A more thorough compliance assessment would involve a wall-to-wall review of regulatory conformance.

An inspection, or audit, is often performed in response to regulatory requirements. In the U.S., OSHA has specific requirements, such as annual lockout/tagout assessments or weekly eyewash inspections. A department or site inspection is performed to look for hazards and the absence of controls. Since incidents may include some at-risk behaviors, inspections often include a review of behaviors and conformance to procedures.

Behavioral observations often fall into this category. A wet floor is an unsafe condition, but an at-risk act means someone has either created or walked on (i.e., failed to avoid) the wet floor and slipped. As a result, it is nearly impossible to have a workplace free from unsafe conditions all of the time, because conditions and people can change and the potential for an unsafe condition always exists.

Inspections are performed on a daily, weekly or monthly basis. Frequency depends on the nature of the control or how often conditions, equipment or people change, as well as legal requirements.

For example, manufacturers usually recommend that emergency stops be tested at the beginning of each shift, while emergency eyewashes and safety showers be inspected weekly.

A true wall-to-wall compliance assessment will typically include three components: conformance, recordkeeping and training. While OSHA does not specifically require companies to conduct compliance audits, compliance requirements dictate certain recordkeeping, programs and training requirements. A compliance assessment is typically performed annually to review the status of written programs, records (e.g., training outlines, attendance) and performance (e.g., conditions and behaviors in the workplace itself).

Program Audit

A program audit gauges the strategy and implementation of a safety program, regardless of whether that program is required by regulation. The goal is to ensure that the company has designed and follows its own procedures and policies.

OSHA regulations require employers to provide employees with a workplace free from recognized hazards and in compliance with certain OSHA standards. To respond to regulations, management develops appropriate programs. For example, one regulatory requirement is to record accidents on an OSHA 300 log and to do so within 6 days. A written program describes who has the responsibility to get this done, as well as the method one would use to investigate the incident. OSHA, while providing suggestions for investigating an incident, does not regulate how to investigate. Thus, a company must define and document the procedure for investigating the accident in order to implement the safety rule or requirement and make it meaningful. Having done so, the company now has a safety program/procedure in place to respond to the requirement. The program assessment will examine how requirements are implemented, in addition to the compliance specifics themselves.

One challenge to a program audit is knowing what to use as a standard or evaluation criteria. There is guidance, but not much consistency, in professional practice when it comes to what should be included in safety programs, policies and procedures. Some fundamentals do exist, however. For one, in any safety program all procedures must be documented so that consistent communication and implementation are achieved. Procedures usually document the responsibilities and implementation strategies and detail how the procedure will be checked, measured and audited.

Another challenge is knowing how to keep a safety program current. New facilities, equipment and personnel often require changes in a program. Effective program management responds to changes that occur in the workplace. Therefore, a program assessment will help ensure that change is successfully managed.

Both the compliance and program audits are useful in identifying potential exposures and risks. They help reveal safety gaps so they can be closed and help determine whether employees and management are following established safety guidelines, rules and procedures.

Management Systems Audit

The management systems process originates from W. Edwards Deming's 14 principles and the plan, do, check, act approach. Deming says, "A system is a network of interdependent components that work together to try to accomplish. . . ." Many management systems standards and guidelines exist in today's professional environment. While most are similar, subtle and not-so-subtle differences exist among the various standards. When selecting a management system to use, most companies mix and match the criteria so that it is a good fit with their corporate structure and culture.

Whatever form it takes, the management systems audit is designed to be a complete process to evaluate and validate the effectiveness of management's commitment to compliance, the level of employee involvement, applicable risk control procedures and often the culture of the organization as a whole. It also examines other business processes, such as accountability and effectiveness of implementation to determine how well the safety and health program is integrated into the organization.

A management systems audit uses a combination of three audit techniques, document review, interviews and workplace observation, to validate and determine effectiveness. Management systems are used to support sustainability by verifying the implementation strategy and integration of the various programs into the company and its existing business practices. It is an evaluation of process, not just a program evaluation.

As an example of a process, consider an inspection program. To be effective, the criteria for inspection (checklist of expected conditions or behaviors) must be determined. A managment systems audit evaluates where the checklist criteria came from and whether the checklist contains the correct items.

Next, qualified inspectors must be identified and trained, and they must understand the expected controls that should be in place to properly perform the inspection. The training process is also evaluated as it is integral to the effectiveness of the inspection process.

Once ready for the inspection, a schedule must be developed, as must an accountability process (responsibility assigned for closure and a measure of closure rates), and a way to track and analyze the findings, to determine whether items are repeated yearly. If so, more inspections do not solve the problem, they only collect more data. Systematic improvement in other processes may be needed to strengthen the inspection and ultimately reduce the frequency of repeat findings.

Together, these steps define an inspection process. As you can see, this inspection process relies on other processes (e.g., accountability) to be effective. Thus, a management systems audit evaluates and verifies not only that the steps in a process are performed, but also that the effectiveness is not compromised by weaknesses in related processes. The collection and integration of processes is known as the *system*. A systems audit drives sustainability, thus ensuring appropriate action can be taken to mitigate current and prevent future risks and losses.

The Basics of a Safety Audit

Regardless of the type of audit or assessment, the goal is to determine safety requirements and expectations, whether regulatory, program, organizational or cultural in nature. Audit criteria or standards to be evaluated can be obtained from industry publications, OSHA, an internal risk assessment or hazard analysis, other businesses' benchmarks, insurance companies or a dedicated consultant.

The process by which the audit is conducted is best when documented so that it can be duplicated each time, even when auditors change. Checklists of evaluation criteria are created to reference at every audit to ensure consistency and clarity of outcomes. These checklists also define an audit's minimum expectations.

Measuring audit outcomes with a scoring process enables management to compare status and evaluate progress. The most common type of scoring is the yes/no answer, where yes equals 1 point and no equals zero points. A threshold is then established and often color-coded to indicate what is good (green), marginal (yellow) or poor (red). This way, success can be measured not only at one place in time, but over many months or years as well. Remember, auditing is not a one-time process. Each audit should be conducted on a periodic basis, but be aware of what is going on between the audits as well. An audit is only a snapshot in time; it is not a substitute for ongoing management involvement.

It takes time to conduct an audit. With more than 100 OSHA regulations, different items within those regulations and typically dozens of programs to implement, a compliance inspection takes from 30 minutes to a few hours to complete. A program or management systems audit can take a minimum of 2 to 3 days to conduct and in some cases a few weeks. If it is the first audit and the company is starting from scratch, it will probably take longer to develop the methodology and checklists than to conduct the actual audit. As a result, companies often look to purchase standards or existing checklists to get started. As the audits are repeated, completion times should improve.

A company may choose a hybrid of all three audits depending on the development and maturity of its safety program.

What Type of Audit Is Best?

All three safety audits present pros and cons. For this reason, many companies do all three audits to a variety of strategies. There are as many different implementation strategies for safety audits as there are companies. A company may choose a hybrid of all three depending on the development and maturity of its safety program. A compliance audit is the most basic, while a management systems audit is the most advanced. Many companies progress from one type of audit to another, as the safety environment dictates. Others perform the inspections and program audits themselves, then bring in a qualified third party to conduct the management systems audit as a reality check. In addition, certifications can be achieved for management systems.

In all cases, safety is an investment—one from which long-term commitment yields long-term results and rewards. The commitment to a continuous improvement process always includes an audit function.

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