

Helpful Suggestions

OSHA Inspection Reception Procedures

What you should do if an OSHA Inspector or other regulatory compliance official arrives at your location...

Pre-Inspection:

- Make sure our front line people know contacts and protocols, ref. *How to prepare for an OSHA Inspection*
- Before conducting an inspection, the officer will research the inspection history of a worksite using various data sources; review the operations and processes in use and the standards most likely to apply. They will bring testing devices to measure potential hazards, and will also judge the outside facility appearance.

Entrance:

- Escort the Inspector to a comfortable waiting area away from operations; offer them coffee, water, etc.
- Immediately contact Corporate (HR, CFO, COO or CEO) and ask them to stand-by to provide advice.
- Alert "Inspection Team" members and instruct them to undertake housekeeping and protective equipment checks to avoid annoying citations, e.g., blocked isles and exits, slip, trip and fall hazards, employees not using required PPE. There is nothing illegal or unethical about taking such last minute preparations
- During the introduction, the Inspector will present their credentials; exchange business cards, etc.
- Set the tone for the visit by being Confident, Cooperative and Compliant, but not Condescending

Opening Conference:

- The Inspector must explain why they've selected the workplace for inspection and describe the scope of the inspection (wall-to-wall or specific complaint), walk around procedures, employee interviews, etc.
- If it is a Compliant Investigation, ask to see a copy of the compliant. Also ask the identity of the employee making the compliant; if the employee asked to remain anonymous, ask whether it is an active employee.
- After obtaining as many facts as possible, fax a copy of the Inspector's "Work Assignment" to your contact at corporate. Then call to discuss whether to allow the inspection, and if so, under what (if any) limitations.
- The Inspector will request documents to review – provide only what's requested, don't volunteer anything!
- Do not provide copies of documents unless requested; If the Inspector asks to keep a copy, immediately make a copy for yourself, to preserve the original from that day in case changes are made a later date.
- If the requested documents are kept at HR (e.g., Workers Compensation records), offer to immediately contact Corporate to obtain copies. If HR is not available, offer to provide them by the next business day.
- Assemble the location's "Inspection Team" to accompany the compliance officer during the inspection.
- In union locations, an authorized employee representative has the right to participate in the walkaround.

Walkaround:

- The Location Manager should remain with, and listen carefully to the Inspector at all times, except during private employee interviews. Another team member should take the exact same notes and photos as the Inspector and nothing more; The Inspector has the right to ask for copies of our notes and photos.
- During the walkaround, an Inspector may point out violations that can be corrected immediately. Direct the Maintenance team member to abate the hazard (correct it, clean-up, tag out of service, etc.) right away!
- If you observe unsafe behavior, instruct the employee to observe proper procedures, use PPE, or cease.
- The Inspector should only walk through the areas of the workplace covered by the inspection to check for hazards. If possible, avoid walking through areas not covered by the inspection, or walk outside.
- Do not reenact any work process or condition; the Inspector is entitled to see only what is happening now.
- Answer questions with provable facts within your personal knowledge and don't volunteer information
- Do not dispute or attempt to justify – Stay Calm, and treat the Inspector Courteously and Professionally

Closing Conference:

- After the walkaround, the Inspector holds a closing conference with location representatives to discuss the findings, potential citations and/or penalties, what happens after the inspection, possible courses of action.
- Don't argue or defend any observation or comment – this is not personal, so don't make it personal
- Only answer questions, don't offer any unrequested info, but do mention anything abated during the visit
- As soon as the Inspector leaves, meet with your Inspection Team to share observations, document other issues, take additional photos of areas of concern, etc., and call the corporate contact with an update.