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EDITORIAL
These are exciting times for ISHM.

For current CSHMs there is an election in progress for three Board of Director positions. Hopefully we can beat the national average for percentage of eligible voters exercising their right to vote.

If you follow LinkedIn you probably have noticed the healthy discussions that have included Safety Manager vs. Safety Cop and why is the safety department the first out the door during times of reduced company income.

What I have taken away from the discussions is that Safety Professionals are dedicated to saving lives, protecting property and improving the environment. This dedication and compassion is saving lives, sometimes almost single handedly and yet so many upper level managers just do not get it.

Section One of this newsletter is an article written by Dave Johnson who is a member of the ISHM Board of Directors. This article written about a session presented by Dr. Krause, in my mind, points out that we, as safety professionals, have a lot of work to get top management in the game.
Dr. Krause stumps safety pros

By Dave Johnson
June 27, 2013

"Are we kidding ourselves?" Dr. Tom Krause, founder of BST and now an independent consultant, asked several hundred safety pros at a session at ASSE’s Safety 2013.

Kidding about what? Dr. Krause’s point: low OSHA injury rates are deceiving many companies into believing they have better safety performance than is really the case. Fatalities and serious, often life-altering injuries on the job are not declining but flatlining, he said. Yet ask many CEOs or manager about the state of their safety program, and they say, “great.”

Meanwhile, Dr. Krause cited studies indicating many safety cultures are mediocre, core safety systems are failing, and incident investigations are often sloppy.

The audience was able to text message questions to Dr. Krause during his presentation, which he could read off of an iPad. And it was evident a number of pros did not take kindly to the idea that they are kidding themselves.

"He calls me an alarmist"

“I’m well aware of the potential for fatalities at my facility,” said one pro. “But when I bring this up to my manager, he calls me an alarmist. What do you suggest I do?"

Said another attendee: “Our legal department wants us to deliberately keep incident findings vague to less the chance of lawsuits.”

“I take my reports on the potential for fatalities or serious injuries to my manager, and he whitewashes them. Am I to go over his head? If I go to the CEO, I could get fired. Is it worth my career?”

The wrong audience

Afterward his session, Dr. Krause said he realized that he was taking his “kidding” message to the wrong audience. “I don’t mean to insult safety pros,” he said. In fact, many cannot do much to press senior leadership on “buying into” the reality that a fatality could be just around the corner, based on audit findings, near miss reports, or other data, he said, without risking their jobs.

It’s the level of management above these pros that is kidding themselves, said Dr. Krause. The level removed from day-to-day safety and who hang onto the OSHA injury rate because it is often a source of their performance evaluation and bonus pay. “I’m thinking I need to aim higher with this presentation,” he said.

Ask the Lawyer

Question: When does training ha have to be bilingual or multilingual? Does that apply to all safety training or just certain standards like GHS?
Answer: The short answer is yes, bilingual or multilingual training may be required depending on the nature of the workforce. The OSHA statute and regulations do not specifically state whether safety training must be provided in English or the employee’s native language, but there are numerous references to training requirements in many of the sub-sections of the General Industry standard, Construction standard and other special industry standards. For example, in the Hazard Communication standard, also known as GHS, OSHA requires employers to provide employees with “effective information and training on hazardous chemicals in their work area.” (1910.1200(h)) In the LOTO standard, OSHA requires employers to provide “training to ensure that the purpose and function of the energy control program are understood by employees and that the knowledge and skills required for the safe application, usage, and removal of the energy controls are acquired by employees.” (1910.147(c)(7)) The training requirements for GHS and LOTO are good examples of the type of training that OSHA requires. As a general principle, OSHA requires employers to provide training to ensure that employees have the necessary awareness, knowledge and skills to perform work-related tasks in a safe manner, understand the health and safety risks of performing those tasks, and utilize all necessary health and safety measures and precautions.

In 2007, OSHA issued an Interpretation on training requirements. OSHA emphasized that employers are required to provide “effective” training in a manner that employees can understand. If an employer fails to do so, it can be cited for failing to provide adequate training. To ensure that training is effective, the employer may have to provide training in the employee’s native language. A copy of the OSHA interpretation can be found at http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=INTERPRETATIONS&p_id=25658.

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