



As states reopen, businesses across virtually every industry will begin bringing their workforces back on site. While we know that both the timing for reopening and the safety risks involved will vary from business to business and state to state, best practices for workplace safety are virtually universal. That's why our team of risk and safety experts has compiled guidance to help you reopen in a way that not only minimizes risk of infection today but promotes greater safety for workers in the future.

- **Section 1:** Re-Think Workplace Safety
- **Section 2:** Embrace a Safety Management System
- **Section 3:** Understand the Hierarchy of Controls
- **Section 4:** Establish & Sustain Acceptable Levels of Risk
- **Section 5:** Launch a Best-in-Class Safety Committee
- **Section 6:** Integrate Continual Risk Assessments



Your Guide to Getting Back to Work Safely



Section 1: Re-Think Workplace Safety

Key Takeaway: Take a balanced approach to managing risks relating to illness and injury prevention

Action: Define a new set of desired outcomes

In just a few short months, the thinking around risk and safety has undergone a complete shift:

- The primary focus for safety has shifted from injury prevention to illness prevention.
- COVID-related data and reporting have become front and center as drivers of performance and decision-making.
- There is a heightened need for reliability and risk controls in processes related to illness and injury prevention.
- Staffing agencies and their clients must find new ways to collaborate to ensure safe work for all employees.

Our former thinking often steered our efforts to primarily focus on preventing physical injuries that could lead to OSHA-recordable events, with very little practice or awareness of risks that could lead to illness.

Find a Balanced Approach to Manage Risk

The COVID-19 pandemic has heightened our need to develop risk controls and safety practices — between both employers — that effectively combat unseen germs. While the current focus is on illness prevention, what is needed is a balanced approach to prevent both illness and injury. So where do we start?

For many companies today, the traditional approach to safety and risk is likely focused on post-incident metrics. That's OK — at least for now. But backward-looking reporting doesn't set the bar high enough when it comes to organizational safety and risk today. Celebrating a certain number of days without a safety incident means very little if your organization can't point to specific behaviors and actions that drive desired safety outcomes. That's true for both injury and illness prevention.

Redefine Safety for Today's Workplace

To ensure the best safety performance, both staffing agency and client must operate from the same definition. Safety is an outcome. It's the result of the things we actively "do" to create the outcomes we want. In a very real sense, it is the things we actively do together that create a safer working environment, and that doesn't happen by accident. In joint-employer work environments where continually improving performance in safety is expected, everyone has a role, and there is clarity about the things we do to achieve the performance we want. As we learn to work through the COVID pandemic, it is a great time to reset expectations for roles, goals and performance, as we learn how to manage risks to acceptable levels in a joint-employer environment.

Start with a Shift in Mindset

What's required is a shift in mindset: Rather than looking in the rearview mirror, a disciplined team of leaders and workers from each employer must do 4 things:

1. Learn how to identify risks
2. Provide feedback on desired behaviors
3. Connect performance goals to safety
4. Communicate upward to leaders of both employers



Section 2: Embrace a Safety Management System

Key Takeaway: Continual improvement is achieved through better risk communications

Action: Integrate a plan/do/check/act (PDCA) process

Prevention of serious illness like COVID-19 is much more effective when people work systematically as teams, solve problems together and create learning environments for continual improvement. Anticipating error, teams solving problems, systems driving reliable and safe behavior are all benefits of an effective safety management system, as well as the basis for human/organizational performance.

What Is a Safety Management System?

A safety management system is a set of interrelated organizational elements needed to prevent injury and illness to workers and to provide safe and healthy workplaces. The system includes:

- Objectives
- Policies
- Processes
- Organizational structures
- Roles and responsibilities
- Planning protocols
- Performance evaluations

How to Build a Safety Management System

There are 4 primary steps to establish and maintain a safety management system:

#1 Plan: anticipate risks and opportunities for better safety

- Commit time and resources to assess hazards and risks, evaluate opportunities for improvement and review other considerations, like legal requirements
- Set both short- and long-term goals
- Establish cadence and commitment, i.e., intervals-weekly/monthly/quarterly-for teams to review goals, risks and progress
- Define the factors that are critical to worker safety in your joint-employer environment, e.g.: workforce management, social distancing, hygiene/sanitation
- Establish KPIs and related performance metrics, including: number of non-conformities identified relating to COVID-19 prevention best practices; number of trainings; KPIs related to serious injury/fatality prevention

#2 Do: activities accomplished together lead to better safety

- Eliminate hazards using the hierarchy of controls methods.
- Evaluate your completion of items identified during the "plan" phase
- Record successes, areas for improvement and course corrections related to your safety-planning activities, including peripheral activities like near hits, root-cause evaluation, compliance activities and creative items, e.g., surveys from employees or front-line supervisors.
- Set target completion dates for each action item, respective to each employer (both client and staffing)



Section 2: Embrace a Safety Management System

Key Takeaway: Continual improvement is achieved through better risk communications

Action: Integrate a plan/do/check/act (PDCA) process

#3 Check: is what we're doing working? adjust/refine

- Monitor the reliability, completion and results of safety activities, including hazard identification, reporting, audit processes and safety committee communications
- Check our communications:
- Check communications across all employers, including orientation, follow-up and front-line supervisor practices and oversight
- Verify knowledge and retention of items critical to safety.
- Identify and report hazards.
- Follow up on open safety items and corresponding actions; ensure they're reliable and match the level of risk (e.g., missing machine guards are ordered and machinery locked out/tagged out until replaced).

#4 Act: we review results, adjust and continually improve

These actions precede and inform the next planning cycle.

- Identify and ensure resolution of any escalations related to items critical to safety.
- Celebrate wins and be sure to communicate any risks removed.
- Align on goals and communication between employers.
- Communicate risk through an established hierarchy of leadership and controls.
- Ensure all items identified during the "check" phase are built into the next planning cycle.

By taking this structured plan/do/check/act (PDCA) approach, each employer contributes to safety in a joint-employer work environment. Alignment with short-term and long-term goals is critical to define expectations, as well as support an established cadence around the PDCA process for the joint-employer team.

The PDCA process should serve as a simple yet powerful tool to keep both employers aligned on managing — and maintaining — acceptable levels of risk.

In light of the COVID-19 pandemic, a fresh assessment of the risks affecting your organization, together with a commitment to building and implementing a strong framework (like the ISO 45001 standard), should place you on the same path as best-in-class organizations.



Section 3: Understand the Hierarchy of Controls

Key Takeaway: The hierarchy of controls is a framework for understanding risk and controls

Action: Review and challenge current thinking

The hierarchy of controls is a common framework for better understanding and communicating risk at the highest level of reliability and control.

Evaluating risk through this lens creates a more collaborative environment for stakeholders to assess controls and mitigate risks. It's directly applicable in the context of staffing, too. Notably, staffing firms and companies can use the hierarchy of controls to identify the most effective controls, then consider the feasibility of applying them before moving down to the next level.

Understanding and practicing the hierarchy of controls is especially valuable when two or more employers are collaborating in a shared work environment. Doing so can unleash tremendous value, lead to greater awareness around risk and controls and help keep workforces safe.

In the context of the COVID-19 pandemic, how can the hierarchy of controls be leveraged for better performance in risk and safety? Consider a few common situations employers are facing right now:

- Returning to work
- Restarting operations following a shut-down, reconfiguring production lines and workcells
- Introducing new sanitation and hygiene protocols

One possible approach is to “decompress” the work environment through workstation design, the use of guards or barriers, limiting seating areas or even adjusting the speed of production to maximize distance. All of these options are worth considering at an engineering level. Of course, not all may be feasible for every work environment, but it is this pursuit of higher-level controls that delivers greater levels of reliability.

Risk always fluctuates during times of change. In fact, how we manage change directly correlates to the level of risk experienced by the workforce. Changing a production line to produce masks instead of curtains, for example, requires wide-ranging reconfiguration — everything from orientation and onboarding to training requirements and more.

For companies undergoing transformation, therefore, a few questions should be top of mind:

1. What's changing in our processes?
2. How are changes and disruptions impacting the workforce?
3. Are there any potential gaps, delays, new risks and processes in our approach to our supply chain or vendor management?
4. What are the limitations and challenges with our current safety equipment, such as the fit and function of PPE?
5. Are front-line managers, as well as the workforce in general, fully informed on any changes? And do they know how to deal with new situations or risks?
6. Can HR and staffing partners contribute in ways that will make my workplace safer?



Your Guide to Getting Back to Work Safely



Section 4: Establish & Sustain Acceptable Levels of Risk

Key Takeaway: Employ positive communications to avoid 'drift'

Action: Identify job specific areas of control

The nature of risk is to fluctuate. So, while we can utilize safety management systems to establish great processes, the truth is that these processes tend to drift from expected levels of performance over time. As a result, a plan-do-check-act (PDCA) methodology is necessary in order to sustain safety efforts — and maintain risk at what has been agreed upon as an acceptable level.

What Causes Drift?

Drift can have any number of different causes, particularly in joint-employer environments: system pressures, production demands, time constraints, turnover, new risks in the workplace and more.

How to Prevent Drift

For both staffing agency and client, strong communication from front-line managers and leadership alike is critical. It's the only way to effectively signal to employees what's really expected of them on the job.

As a component of strong communication, regular observation and feedback specific to work-related risks and safety standards is also important. It supports a healthier culture, increasing morale and encouraging employees to speak up.

Avoid Weak and Negative Communication

Standard work and safety practices are often only delivered during orientation and only followed when the boss is around. When supervisors aren't in sight, shortcuts and other measures that contradict safe work practices tend to be commonplace. Worse, safety messaging typically only circulates in the aftermath of an injury or incident, which amounts to communicating what people already know — along with the more negative messaging, likely assigning blame to employees when things go wrong. This is the worst-case scenario. It has repercussions for the rest of the workforce and significantly undermines the creation of a healthy culture.

Now, think of what positive, job-specific safety feedback needs to be given to restore and re-establish expectations. This is considered a strategic intervention, as it's informed by knowledge of risk matched to job type and has been anticipated and planned for through the PDCA process.

Strengthening communications to maintain acceptable level of risk

Managing and sustaining acceptable levels of risk is always a work in progress. Only by continually engaging in dialogue and coordinating with stakeholders at all levels, internally as well as externally, will organizations strengthen their risk and safety performance over the long haul.



Section 5: Launch a Best-in-Class Safety Committee

Key Takeaway: Safety committees are most effective when diverse in representation

Action: Establish a best-in-class safety committee, and have fun

In the context of fast-paced work environments, it can be easy to forget that organizational culture, management of change and anticipation and intervention of risk is established from the tone at the top. It's a chance to bring leadership together with team members from diverse areas of your organization not only to define goals, but to ensure you continue to make progress toward them.

Knowing that, embrace seven components of best-in-class safety committee programs to ensure success:

1. **Ensure Diverse Representation:** Include representatives from all departments and shifts at your organization, as well as leaders and influencers in important areas such as human resources, procurement and legal. If the goal of meeting together in a safety committee is to highlight strategic improvements and effectively manage risks, these critical influencers are needed for buy-in and communications to organizational leadership.
2. **Set Clear Expectations:** What common goal is everyone working toward? How will you benchmark progress — and what will success look like? Outline short-term goals, long-term goals and a simple process of collecting risk observations and feedback on adherence to safety processes. Then, conduct a simple “what’s working/not working” session so everyone can contribute. Make it easy, and expected, for everyone to contribute and deliver results/feedback at the next meeting.
3. **Provide Support and Needed Resources:** While senior leaders may not always be able to attend, their visible support, periodic attendance and contribution is critical for buy-in from the workforce. Managing time well as a resource is critical during these meetings, which demonstrates to the organization the importance of getting things done correctly, and keeps the team focused on the safety committee’s main goal. Other tools and resources needed by safety committees might include: an established time/place to meet; an agenda; leadership support by various departments; budget: one that's reasonable and that anticipates future needs; set rules for time and attendance, along with expectations for contribution; tools and training.
4. **Provide a Clear Agenda:** Draft agenda items for each meeting agenda well in advance. What's going to be covered, why is it important? This will keep everyone on track when setting goals.
5. **Set Scheduling Expectations:** Everyone on the safety team should be aligned on the cadence of meetings that's appropriate for your organization. In the event that absences become an issue, first speak to the party in question privately, and gently remind them of the importance of your collective goals. The bottom line is that attendance must be mandatory for all.
6. **Set Tracking and Monitoring Goals:** Aim to wind down each meeting with a resolution on, say, two or three separate safety issues. These should be concrete goals — with limited scope — that can be effectively resolved before your next meeting. Just be sure to follow up! Items critical to safety/health, such as Serious Injury/Fatality exposures should be addressed immediately.
7. **Communicate:** Some sort of organization-wide communication should follow on the heels of every safety committee meeting. What are you working on? What are the short- and long-term goals? Sharing the committee's work not only increases visibility, but helps secure buy-in from team members across the company. Share the successes achieved through the collaboration between the safety committee and operations groups.

Finally, keep in mind that it's still possible to have fun — in fact, that can be what differentiates organizations that succeed with safety from those that don't.



Section 6: Integrate Continual Risk Assessments

Key Takeaway: Continual risk assessment drives continuous improvement

Action: Strengthen collaboration between clients and staffing firms to improve risk management and safety

A top-notch safety culture is one where both leaders and workers understand the behaviors and conditions that improve safety outcomes, and feel empowered to proactively create a safer future. As a safety leader, it should be your goal to communicate these messages. The alternative — missing out on this opportunity to communicate the right messages — still sends a message, but winds up being the wrong one.

Then, if incidents do occur, how we respond matters. Investigations must be thorough, without bias or assumption of employee error. In today's environment, where COVID-19 is such a highly contagious event, the response and processes of joint employers must include:

- Uniform adherence to CDC and OSHA guidelines
- Quick communications around quarantining
- Careful evaluation of each at-risk exposure
- Mitigating controls like enhanced cleaning, sanitation or isolation practices

Post-incident response should include at least a precursory review of the classification of the hazard and prioritization of risk controls as it relates to those hazards.

3 Factors to consider when classifying and prioritizing risks

1. **The severity of the potential outcome:** Based on the hierarchy of controls, do we have the correct mitigation and controls in place? Do we need to reevaluate?
2. **The likelihood of an event or exposure occurring:** If error is predictable, how are we anticipating these events as a team?
3. **How many employees are at risk:** Control risk at the highest level possible in the hierarchy of controls if there is serious injury/fatality exposure, regardless of the number of employees involved. Have density of work cells, proximity and risks from both physical and biological conditions been factored in?

As we continue to face unprecedented health and safety challenges in the workplace, strong partnerships between staffing firms and clients can lead to insights and innovative solutions in risk management to keep all employees safer.