

Staffing Agency Policy and Procedure Checklist

"Host employers need to treat temporary workers as they treat existing employees. Temporary staffing agencies and host employers share control over the employee, and are therefore jointly responsible for temp employee's safety and health. It is essential that *both* employers comply with all relevant OSHA requirements."

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The following checklist will guide the host and the provider company with guidance to ensure the management and safety of the temporary employee has been reviewed and discussed prior to engaging in work activities. This document shall be used as a reference to spur discussions between the host and provider with the intent to protect the temporary worker.

Both Parties

Pre-hire/Pre-agreement:

- **Complete a Job Hazard Analysis** for the job the temporary worker will be assigned. The staffing agency and the host employer should jointly review all worksites in order to identify and eliminate potential hazards.
- **Develop a training plan** for the temporary worker to ensure they will be trained on safe work practices, control measures and specific job functions. This could be divided up between the host and the provider, where the provider instructs on overall safe work practices and the host focuses on specific job hazards the employee will face.
- **Finalize** and formalize any differences between the host and providers safety policies and procedures. Once you have identified the differences, decide which policy will supersede the other so everyone is clear on the employee expectations.
- **Write out a contract** to define the following:
 - The job tasks the temp employee will perform;
 - The required experience and job qualifications for the employee
 - Define what training the employee will need AND who will complete and documents the training
 - Detail hazard controls that will be in the work environment
 - Detail the personal protective equipment (PPE) that the workers must use, who will pay for it, who will provide it and who will train the employee how to use and care for it.

- Define tasks the employee will NOT be allowed to do, if applicable, such as confined space entry, working from heights, or live electrical work
- Detail the procedures for reporting and recording work-related injuries, include who will coordinate medical care and treatment, and return to work protocols.

During the work assignment:

- **Communicate** about the job
 - Discuss incidents that occur
 - Changes in job task assignments, tasks, or processes
 - New hazards introduced into the workplace

Staffing Agencies

PREPLAN before engaging in business with client sites:

- **History** of the client including:
 - Workers' compensation experience modification rate (EMR) or (EMOD).
 - OSHA days away from work, restriction, or job transfer (DART) rate
 - OSHA 300 logs
 - Research for past OSHA inspections and/or violations via osha.gov website
- **Records review** of the host employer's written safety policies and procedures including:
 - Risk management policies, procedures and practices
 - Safety and health policies written in employee handbook
 - Disciplinary policies for breaking safety rules
 - The hazardous communication plan if workers are exposed to chemicals
 - Any other written plan required for the facility
- **Seek** to learn:
 - The jobs your employees will under take
 - The hazards the employee will be exposed to
 - The protective measures that will be taken to protect them (training, PPE etc.)
 - The required skill set required to perform the job
- **Walk through inspection** of the host site to perform a basic safety assessment. Ask questions of the client to be sure you know the hazards of the job, how the employee will be protected and observe the operations. At a minimum the following observations should be made:
 - Housekeeping. Check to see if the facility is clean, are work areas free of slip trip and fall hazards. Are the floors well maintained and aisle ways free of debris
 - Exit routes. Are the exit routes marked and free of obstructions
 - Machinery. Review work areas to see if the machines have guards in place. Does the equipment appear to be clean and in good working order?
 - Ergonomics. If possible observe the job assignment to see what the employee will be doing. Take note of any repetitive motion such as bending, stooping, awkward postures, heaving lifting without aids, etc.

- ER Preparedness. Are there first aid kits readily available? Are fire extinguishers located throughout the facility? What are the company's plans for responding to medical and fire emergencies?
- **Assign the employee** that has the experience and qualifications to meet the job demands. When matching the employee to the job consider these factors:
 - Previous on the job training the employee has had
 - Certifications the work holds that is relevant to the job
 - Experience the worker has in similar industries as the host site
- **Prepare the employee** by offering general safety training to them prior to sending on-site.
 - Educate the employee as to what applicable topics have been agreed upon in the contract
 - Establish an open line of communication with the employee so they know who to rely upon if questions arise during their work assignment

During the work assignment:

- **Verify** that the host employer has kept their agreement to provide a safe workplace for the employee. Consider visiting the site and conducting a follow up to look at these specific areas:
 - Are the temporary employees receiving the same level of protection offered to the permanent employees?
 - Verify the temporary employees have been trained and training has been offered in the language they understand
 - Verify the host employer has supplied the temp employee with personal protective equipment
- **Talk** to your employees at the site and encourage them to raise any safety concerns or questions that they have. At least ask them:
 - Do they feel they have been adequately trained?
 - Do they feel safe in the work environment?
 - Do they know what to do when they encounter a work hazard?
 - Encourage them to not be afraid to speak up and ask questions of the host site and of the staff agency
- **Communicate** with the host employer regarding the employees' work performance to see how things are going.
- **Coordinate** with the host employer following any work-related injuries or illnesses your employee experience to ensure proper recordkeeping is maintained and that the employee returns to work as quickly as they are able.
- **Recordkeeping** is essential to ensure you have properly accounted for OSHA recordkeeping, employee exposure records, and medical surveillance just to name a few.

Host Employers

Before hiring temporary workers:

- **Research** the staffing agency's background, philosophy, overall attitude including:
 - Workers' compensation experience modification rate (EMR) or (EMOD).
 - OSHA days away from work, restriction, or job transfer (DART) rate
 - OSHA 300 logs
 - Research for past OSHA inspections and/or violations via osha.gov website
 - Inquire about recent incidents
- **Records review** of the staffing agencies:
 - Risk management policies, procedures and practices
 - Safety and health policies written in employee handbook
 - Disciplinary policies for breaking safety rules
- **Inquire** if the staffing agency provides training to the workers and verify the training is complete in the language the employee is fluent in to verify understanding. Ask to see a copy of the employee training records that verify the training has been completed.
- **Assessments** need to be completed to document what hazards the employee will be exposed to and how they hazards will be mitigated. Document a job hazard analysis and a personal protective equipment assessment for the position the employee will be filling.
- **Detail** the job duties and tasks the temp employee will perform, the required skills, and the training you expect the agency to provide before the employee reports to work. Detail the specific training the host employer will provide also.

After hiring temporary workers:

- **Train** the employee on site-specific and job-specific materials. Include in the training
 - The hazards the employee will be exposed to
 - Safe work practices to mitigate these hazards
 - Emergency procedures
 - Site-specific safety policies
 - What to do in the event of an injury, illness or concerns presents

During the work assignment:

- **Train** the temporary employee in the same manner that all other hired employees have been trained.
- **Protect** the employee by providing any and all necessary PPE
- **Include** temp workers in any safety programs offered at the facility, including safety meetings and toolbox talks.
- **Encourage** communication from the worker so they know to report hazards they encounter and to communicate any concerns that they might have while working at the facility.
- **Communicate** directly with the worker so they know how they are doing.

- **Record** any workplace injuries or illnesses temp workers experience on your OSHA 300 Log, unless the temp agency provides an on-site supervisor who oversees the workers' day-to-day activities as in accordance with *29 CFR 1904.31(b)(4)*.
- **Inform** the staffing agency if the employee becomes injured or ill on the job and coordinate medical treatments if necessary.

Additional information regarding Protecting Temporary Workers is available on the OSHA website at www.osha.gov