

PLANNING ROUTINE OSH INSPECTIONS in an Occupational Health & Safety Management System

By Lori A. Schroth and Bradley T. Renwick

Why should my organization establish a routine OSH inspection process? The “why” for conducting routine OSH inspections varies by organization and depends on the overall compliance landscape and OSH culture of an organization.

Routine inspections are an important aspect in OSH and every occupational health and safety management system (OHSMS) model, as workers conduct these inspections rather than OSH professionals. Routine inspections allow workers to take additional ownership of OSH and become more involved in OSH efforts. Additional reasons include:

- Support established risk management strategies to prevent occupational injuries and illnesses.
- Facilitate identification of potential hazards, unsafe work practices and faulty equipment.
- Ensure compliance with OSH regulations.
- Provide valuable data for trend analysis and continual improvements to the OHSMS.
- Enhance worker awareness to OSH and workplace hazards.
- Increase worker involvement and participation in OSH and the OHSMS.
- Show that the organization fosters an OSH-conscious culture.
- Document workplace findings.

Creating an effective routine OSH inspection process involves careful planning, clear procedures and a commitment to continual improvement. An organization can accomplish this by applying the plan-do-check-act (PDCA) cycle for continuous improvement framework. The planning phase is essential, as it sets the foundation of the routine inspection process and provides a sense of direction and purpose by establishing what to achieve, why routine inspections are important and how to go about inspecting the workplace. A well-planned process aids efficient resource utilization, effective decision-making, and the ability to anticipate challenges during implementation and sustainment. As OSH consultants, the authors have identified several successful practices to create an effective routine OSH inspection process.

This article shares several discussion topics and implementation ideas to consider when planning a routine OSH inspection process, including inspection

areas, checklists and frequency, selection and training of inspectors, scheduling and completion of inspections, documentation and findings, and incentives and awards. Table 1 outlines several questions to consider for each of these topic areas when planning a routine OSH inspection process.

Inspection Areas

Identifying which areas to inspect at your organization is vital to the routine inspection process. Examine the different workspaces at the organization, evaluate the work activities performed in each, and determine which to include in the routine OSH inspection process. It

TABLE 1
DISCUSSION QUESTIONS

Discussion questions to plan a routine OSH inspection process.	
Areas of routine inspection process	Discussion questions
Inspection areas	<ul style="list-style-type: none"> •Which specific areas need to be inspected? •Are there high-risk areas to inspect?
Inspection checklists	<ul style="list-style-type: none"> •Is an inspection checklist necessary to guide inspectors? •Is a general or more specific checklist better for each area? •Will the same checklist be used every inspection? •What are the plans to trial the checklists and make modifications?
Inspection frequency	<ul style="list-style-type: none"> •Does the OHSMS criteria say how often routine inspections need to be done? •How often should inspections be done in each inspection area? •Should frequency of inspections be increased in areas with higher numbers of injuries and illnesses, reported hazards or higher-hazard inspection areas?
Inspector selection	<ul style="list-style-type: none"> •Who will perform routine OSH inspections? •Do we want to ask for volunteers? •How many inspectors should be assigned to an inspection area? •Will assigned inspectors look at areas they work in or other inspection areas? •How long will each inspector be assigned to an area?
Inspector training	<ul style="list-style-type: none"> •How will inspectors be trained? •What will inspectors learn during training? •What is the process for documenting training?
Inspection scheduling and completion	<ul style="list-style-type: none"> •How can inspectors be reminded of a scheduled inspection? •Do we need a process to find backup inspectors?
Inspection documentation and findings	<ul style="list-style-type: none"> •How are completed inspections documented? •Should inspectors document findings that are “fixed on the spot”? •How will findings be tracked and monitored? •How are inspection findings captured for trending purposes? •Where will completed inspection forms be maintained?
Incentives and awards	<ul style="list-style-type: none"> •Should routine inspections be tied to an incentive and awards program? •What kinds of incentives and awards should be offered? •What are the conditions to receive an incentive or award? •How often will routine inspectors be incentivized?

FIGURE 1
ZONED INSPECTION AREAS

is recommended to include all areas that workers occupy, wall-to-wall, including break rooms, kitchens, restrooms, closets, public spaces and offices. Determine how many workspaces there are, how big they are and how many workers are in each area. This information guides decision-making for the number of inspectors, how long an inspection should take and items to look for in each area.

Good Practices

A good practice is establishing boundaries to create inspection zones throughout the organization. Figure 1 shows an example of zoned areas for routine inspections. Zoning offers many benefits, such as:

- ensuring that the inspection area is the right size for the duration and focus of the routine inspections,
- allowing you to break large areas down into smaller ones and group like areas together, and
- showing inspectors the boundaries for their assigned inspection area.

Inspection Checklists

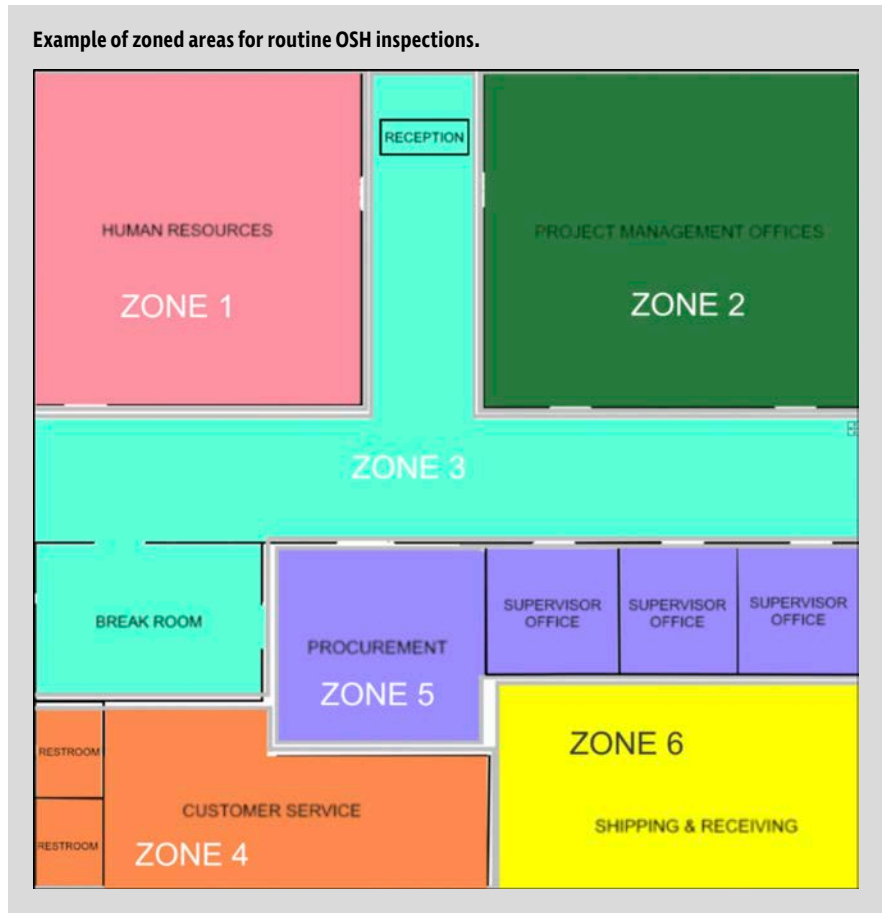
A checklist can guide inspectors on what to look for during inspections and add a level of consistency to the items inspectors are searching for during routine inspections. A checklist can also provide an avenue to easily document findings and the completion of the inspection.

For each checklist, think about what to include and how detailed to make it. The selected inspectors may drive this decision, as routine inspectors can have a varying range of OSH knowledge and limited time to complete these inspections. For example, novice OSH inspectors may need more detailed guidance when conducting an inspection and may take longer to complete an inspection, whereas a more seasoned OSH inspector may be able to walk through an area and quickly complete the inspection. Use this information to determine the detail needed in each checklist.

Good Practices

Several good practices should be followed for creating inspection checklists:

- Tailor checklists to the inspection area, especially when using more detailed checklists. For example, why would an inspection checklist for an office include items such as confined spaces or arc-flash hazards? This can confuse inspectors and takes unnecessary time to mark off items that are not applicable. Discuss what



is best for your organization; perhaps it would be best to use two checklists—one for general office inspections and another for industrial areas. Maybe each inspection area gets their own tailored checklist, or perhaps the checklist changes every month (e.g., October is a list of items related to fire safety, November includes hazard communication-related items, December includes items on ergonomics).

- Refer to baseline OSH assessment results for each inspection area (baseline hazard assessments are generally a part of any OHSMS). Incorporate the identified OSH hazards into the checklists, making them as general or specific as needed.
- Allow inspectors a way to document “corrected on the spot” findings directly on the checklist. This supports trending processes to analyze commonly identified hazards from routine inspections.
- Incorporate any identified trends related to inspection findings onto the checklist so inspectors can focus on them (this is nice when OSH professionals cannot be everywhere all the time).
- Think about the overall length of the inspection checklist. Is running the checklist going to take all day, or can an inspector complete it in a reasonable time?
- Ensure that the checklist items are within the inspector’s capacity for

inspection. Are the included items factors that the inspector will be knowledgeable of and can visually check? For example, an item states “Make sure the exit is in compliance with OSHA regulations.” In most cases, the typical routine inspector will not know the OSHA regulations well enough to confirm whether the exit complies with OSHA regulations, so they will not know how to inspect this item. Instead, add definitive items to the checklist, such as “The pathway leading to each exit door is free of boxes, storage and other obstructions,” and “Each exit door has an illuminated exit sign over the door.”

- Trial created checklists to see how they work during the inspection process, and ask inspectors for feedback on the inspection checklists, revising each checklist as needed.

Think of checklists as living documents, especially if you use the same checklists for each inspection. Update checklists as time passes, the workplace changes, or upon the introduction of new hazards, processes or materials. Figure 2 (p. 16) shows an example of an office inspection checklist.

Frequency of Inspections

The OHSMS criteria is the ultimate determination for setting the routine inspection frequency. For example, the

BEST PRACTICES

OSHA Voluntary Protection Programs (VPP) requires routine inspections of the entire workplace every quarter, with monthly inspections. Refer to the OHSMS model your organization is implementing to help determine the frequency of routine OSH inspections. Think about how often your organization wants to conduct routine inspections. This could vary depending on the work activities performed in each area.

Good Practices

It is good practice to increase inspection frequency in areas with a spike in injuries or illnesses, those with an increase in reported hazards or near-misses, or work areas that simply have inherently more dangerous work performed. It is important to include OSH professionals in any frequency-related discussions and decisions, as this information could point to root causes and contributing issues that a routine inspector might not be able to understand when it comes to injury and illness prevention.

Inspector Selection

It is important to define any qualifications, training or knowledge expectations for routine inspectors before inspections begin. Think about how long to assign inspectors to an inspection area. Common durations include one quarter, 6 months or 1 year. Changing inspectors more frequently increases worker involvement in OSH at your organization, but it can also require more effort to train them on the process.

Good Practices

It is good practice to seek out volunteers to serve as routine inspectors, as they are willing to be involved in this effort. A workplace survey or email asking for volunteers is one way to identify those interested in participating.

Another good practice is identifying backup inspectors in case the primary routine inspector cannot perform the inspection due to business travel, workload, personal reasons or other reasons. The backup inspectors should have the same

training and information for the routine inspection process and be ready to jump in and complete the routine inspections when needed. This practice also improves inspection completion rates.

Another good practice is assigning inspectors to inspect areas they are not familiar with because this can bring a fresh perspective to identifying hazards.

Inspector Training

An organization must determine how inspectors will become educated on the organization's routine OSH inspection process and receive information on hazard recognition. Trained inspectors are knowledgeable inspectors. Inspectors require knowledge about workplace hazards and hazard recognition, as well as the organization's routine inspection process. Hazard recognition training is often an OHSMS requirement. Examples of hazard recognition training include:

- a presentation on common inspection area hazards,
- hands-on training from previous inspectors for new inspectors, and

FIGURE 2 **EXAMPLE OFFICE INSPECTION CHECKLIST**

Below are some examples of Unacceptable items to look for:			
Trip/Fall/Slip Hazards: water, carpet worn or uneven, cords or cables, obstacles			
Building Maintenance & Appearance: inadequate lighting, damaged walls, ceilings, floors, damaged equipment, damaged electrical cord, outlets or boxes			
Safety: blocked exits, fire extinguishers, fire pull stations, evacuation maps, electrical panels, and exit or fire extinguisher signs. Roofs on cubes or blocked vents			
Unapproved equipment: heaters, humidifiers, microwaves, coffee warmers and makers, refrigerators, candle/incense burners, power strip plugged in to power strip.			
NOTE - Mini-refrigerators are permitted if plugged directly into a hard wall receptacle. Small desk fans are also permitted.			
Document all <u>Unacceptable items</u> or <u>Problems fixed at time of inspection</u> next to the appropriate area below.	Acceptable	Unacceptable*	Problem fixed at time of Inspection*
Halls/Walkways/Stairwells: []	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Common Areas (Copier/Supply Rooms): []	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Kitchens and Restrooms: []	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Conference Rooms: []	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Cubes/Offices: []	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
First Aid Kit (if present): Is Kit adequately supplied and accessible? Use checklist inside of kit. []	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Are Fire Extinguishers inspected? (Inspection Tag present and up-to-date, arrow in the green, extinguisher readily accessible and visible)? []	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Miscellaneous: []	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Use judgment for any issue that seems questionable. Always err on the side of caution.			
*Any item found Unacceptable or Fixed during inspection will be entered in to the EHS FUMS by EHS staff if warranted. Scan and send completed form to vpp@psj.com, or send via interoffice mail to [] (Select VPP from the destination list on the multi-purpose printers.)			
Scanned _____ (initial)			
Inspector Name: []	Location(s) of Inspection: []	Date of Inspection: []	

•an OSHA 10- or 30-hour general industry class.

Good Practices

It is good practice to train inspectors prior to any routine inspections. It is common to see an organization create its own internal training on the organization's routine inspection process. Sometimes organizations rely on a third party to provide hazard recognition training.

Make sure any training provided is effective by using instructor evaluations, course evaluations and critiques, student feedback, and observations of the routine inspection process. Document any training provided. Documentation proves the inspectors received training and that they know what to look for, making the inspection process more effective.

Inspection Scheduling & Completion

Think about ways to inform inspectors that it is time to complete a scheduled inspection. What works best at your organization? What happens if an inspector cannot complete a scheduled inspection?

Develop a process for when an inspector cannot complete a scheduled inspection on time. Who should inspectors notify if they cannot complete the inspection, and how? How is a replacement inspector assigned? Having a plan helps minimize late or incomplete inspections.

Good Practices

A good practice for inspection reminders is sending emails or setting up calendar reminders. Ensure that reminders provide inspectors with advance notice to complete the inspection on time. Another good practice is maintaining a list of trained backup inspectors to utilize when an inspector cannot complete an inspection on time.

Inspection Documentation & Findings

Decide how to document the completion of an inspection and its findings. Inspectors can use one form to document the inspection and findings, follow a checklist and make a list of findings, or simply notify the safety office that the inspection is complete and send a list of findings for OSH professionals to track. Decide what works best for the organization and determine where to store completed forms, logs or emails.

Good Practices

A good practice to documenting inspections is ensuring that the documentation captures:



This article shares several discussion topics and implementation ideas to consider when planning a routine OSH inspection process.

- inspector name, including additional employees participating in the inspection,
- date of completion,
- hazards corrected during the inspection, and
- hazards identified that require additional attention (e.g., work orders).

Another good practice is identifying how to capture and track inspection findings. It is common to designate an individual to collect, review and follow up on documented inspection forms; this is not always the safety office. The individual can track and trend the findings, issue work orders and corrective actions as needed, and assist in hazard correction and mitigation. Ensure that designated individuals have access to any systems needed and have established relationships with the safety office and others to promote ease when submitting work orders and following up on inspection findings.

Incentives & Awards

Workers greatly appreciate recognition for a job well done. Set conditions for receiving the award or incentive when participating in the routine OSH process,

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such as that 100% on-time routine inspections receive an incentive. Decide how often to reward inspectors. Every year or once they pass inspector duties to a colleague is a common practice.

Good Practices

It is good practice to link the routine inspection process to an incentive and awards program, if possible. Do not reward individuals for simply being an inspector. Reward them for performing the inspections, completing them correctly and conducting them on time. Choose incentives and awards that motivate routine inspectors in doing a good job. Examples include a pizza party, time off, monetary awards or recognition from leadership.

Conclusion

A well-planned and carefully executed routine OSH inspection process is needed for the sustained success of any organization that is implementing an OHSMS. Strategic planning allows an organization to create an inspection process that fits their needs and has long-term sustainability due to the anticipation of challenges and continuous improvement focus. The feedback and data collected during the process creates a valuable foundation for continual improvement, driving process refinement and optimization. Ultimately, a well-planned routine inspection process promotes worker involvement in OSH and fosters a culture of excellence, which are fundamental elements of any long-term success with an OHSMS. Review the good practices in this article and see if they are a good fit for your organization so you can establish or revamp your routine OSH inspection process. **PSJ**

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