

Appendix B - Safety and Health Management Program Audit Tool

1. Demonstration of commitment to workplace safety and health. Has the company:
 - A. Developed a written policy supporting workplace safety and health
 - i. Can both managers and workers describe the safety and health policy?
 - ii. Can both managers and workers give examples of management leadership's commitment to safety and health?
 - iii. Can workers give examples of management following safety rules?
 - B. Defined and documented effective safety goals?
 - i. Has Republic clearly stated well-defined goals for the safety program?
 - ii. Is progress toward the goals of the safety program measurable?
 - i. How is progress measured?
 - ii. Is progress evaluated periodically? How often?
 - iii. Are the goals re-evaluated periodically to ensure they continue to reflect the current status of the safety program?
 - iv. Are new goals set when a goal is reached, or is no longer appropriate?
 - iii. Has Republic clearly communicated the goals of the safety program to both managers and workers?
 - i. Can both management and workers clearly explain safety goals?
 - ii. Can both management and workers accurately describe the current progress toward safety goals?
 - C. Defined and documented safety expectations?
 - i. Has Republic developed clearly defined safety expectations for both managers and workers?
 - ii. Have the expectations been communicated to both managers and workers?
 - iii. Can both managers and workers describe, in their own words, safety expectations as they apply to their position?

- iv. Has Republic developed clearly defined safety expectations for contractors?
 - v. Have the expectations been communicated to contractors?
 - vi. Can contractors describe Republic Steel's safety expectations for contractors?
- D. Developed a means of implementing the Program?
- i. Have responsibilities been clearly defined for managers and workers?
 - ii. Can both managers and workers describe their safety responsibilities?
 - iii. Can both managers and workers describe their day-to-day safety duties?
 - iv. How are managers and workers accountable for their safety responsibilities?
 - v. Can both managers and workers describe the consequences for failing to fulfill their safety responsibilities?
- E. Developed a means of maintaining the program?
- i. How are program improvements identified outside of the evaluation process?
 - ii. How are potential areas for program improvement prioritized?
 - iii. How are needed changes tracked?
 - iv. Who is responsible for tracking corrective actions or improvements?
 - v. Can managers and workers describe program improvements resulting from program evaluation?
- F. Allocated appropriate resources (funds and time) to accomplish goals and manage the Program?
- i. What is the process for identifying the need for additional safety resources?
 - ii. Who is responsible for ensuring that needed safety resources are appropriate?
 - iii. Who is responsible for requisition of requested resources?
 - iv. What is the process for tracking acquisition, delivery and implementation of requested safety resources?
 - v. Who is responsible for tracking resource implementation?
- G. Developed a means of recognizing worker contributions to workplace safety and health?
- i. What are the processes for workers to contribute to safety and health?

- ii. Do contributions elicit prompt feedback?
 - iii. How are employees recognized for contributions to safety and health?
2. Worker involvement. Has the company:
- A. Involved workers in defining and developing the Program structure?
 - a. How did workers contribute to developing the Program structure?
 - b. Were worker contributions acknowledged?
 - c. How did workers receive feedback on their contributions?
 - B. Assigned roles to workers in implementing the Program?
 - a. What are descriptions of different roles of workers in the Program?
 - b. How are roles evaluated as the Program is updated, and role requirements change?
 - c. How are changes in worker roles communicated?
 - C. Ensured that workers are active in evaluating and updating the Program?
 - a. How are workers involved in Program evaluation?
 - b. How is involvement encouraged?
 - c. How is worker participation in Program evaluation measured?
 - D. Ensured workers know to, and know how to, report injuries, illnesses, hazards, or concerns, including good catches/near misses?
 - a. Can workers describe the reporting process?
 - b. Can workers describe examples of concerns that were reported and the resultant actions?
 - c. How are workers encouraged to consistently report injuries, illnesses, hazards and concerns?
 - E. Acknowledged and resolved reports of injuries, illnesses, hazards, or other concerns promptly?
 - a. Are their records of safety reports that required action?
 - b. How were the reports acknowledged?

- c. How were reports tracked until resolution?
 - d. How were reports resolved?
 - e. How were the reports communicated to other sites?
 - f. How were the reports communicated to workers?
 - g. How were the resolutions communicated to other sites?
 - h. How were the resolutions communicated to workers?
- F. Involved workers in workplace inspections?
- a. How do workers contribute to workplace inspections?
 - b. Can workers or managers provide an example of worker contributions to a workplace inspection that resulted in a safety improvement?
 - c. How are the results of workplace inspections communicated to workers?
 - d. Is there a process for workers to provide feedback on workplace inspection results?
- G. Involved workers in incident investigations?
- a. How do workers contribute to incident investigations?
 - b. How are the results of incident investigations communicated to workers?
 - c. Is there a process for workers to provide feedback on incident investigations?
- H. Ensured that workers can report injuries, illnesses, hazards, or other concerns without fear of reprisal, pressure from superiors or coworkers, loss of incentives tied to injury rates, or post-incident substance abuse testing?
3. Identifying hazards. Has the company:
- A. Reviewed written materials such as injury logs, safety data sheets, medical reports, results of workplace inspections, incident investigation reports, and manufacturers' literature to identify hazards?
 - a. How often are records reviewed to identify hazards?
 - b. What types of records are reviewed?
 - c. How are the hazards identified communicated to other sites, managers, workers, and contractors?

- d. How are the hazards identified tracked until resolution?
- B. Analyzed trends in injury and illness data that indicate the presence of common hazards?
 - a. How often are injury and illness data reviewed?
 - b. How are the hazards identified communicated to other sites, managers, workers, and contractors?
 - c. How are the hazards identified tracked until resolution?
- C. Inspected the workplace regularly to identify conditions that pose or could pose a safety or health concerns, violations of the OSHA standards, and recognized hazards?
 - a. How often are inspections performed?
 - b. How are the hazards identified communicated to other sites, managers, workers, and contractors?
 - c. How are the hazards identified tracked until resolution?
- D. Established a hazards mapping team, providing hazards-mapping training, and performing hazards-mapping exercises?
 - a. How often is hazards mapping performed?
 - b. How are the hazards identified communicated to other sites, managers, workers, and contractors?
 - c. How are the hazards identified tracked until resolution?
 - d. How is training tracked?
 - e. How is the need for retraining identified?
 - a. Is there a process for workers to provide feedback on the hazards-mapping results?
- E. Ensured that managers ask workers about hazards and safety concerns in their work areas, and informed workers of these hazards when discovered?
 - a. Can workers describe instances where managers have asked workers about hazards in their work areas?
 - b. Can workers describe an instance where a worker identified a hazard in their work area that was subsequently fixed?

- c. How are hazards identified in one work area communicated to managers, workers, and contractors in other, similar work areas, including at other sites?
 - d. Is there a process to track hazard reports and subsequent fixes resulting from managers asking workers about hazards in their areas?
 - F. Investigated incidents to identify any hazards previously unrecognized or inadequately controlled?
 - a. Have any incidents required investigation?
 - b. Were workers included in the investigation team?
 - b. How are the results of incident investigations communicated to workers?
 - c. Is there a process for workers to provide feedback on incident investigations?
 - c. Can workers describe an instance where an incident investigation led to the discovery and abatement of a hazard?
 - G. Conducted all inspections and exposure assessments required by OSHA standards?
 - a. List the inspections and exposure assessments performed since the last audit.
 - H. Identified hazards associated with emergencies and non-routine operations?
 - a. How does the company identify appropriate emergencies and non-routine operations that may reasonably be needed?
 - b. How are hazards that may result from emergencies and non-routine operations identified?
 - c. How are these hazards tracked until abatement?
 - d. How is the existence and location of these hazards communicated to other sites, managers, workers, and contractors?
 - e. What is the process to review emergencies and non-routine operations to ensure that any corrections applied remain in place, and that new hazards have not developed?
 - f. Is there a process for workers to provide feedback on hazards resulting from emergencies and non-routine operations?
- 4. Controlling hazards. Has the company:
 - A. Developed a hazard control plan?

- a. How is the hazard control plan communicated to workers, managers, and contractors?
 - b. Is there a process for revising the hazard control plan to reflect current work conditions?
 - c. Is there a process for workers to provide feedback on the hazard control plan?
- B. Controlled hazards according to the “hierarchy of controls”: 1) engineering controls, 2) work practices, 3) administrative controls, and 4) PPE?
- a. For hazard controls that use work practices, administrative controls, and PPE, has a hazard analysis been performed?
 - b. Does the hazard analysis indicate a valid reason for using a less protective control?
 - c. Is there a process for periodically evaluating the hazard and its control to determine if changes permit the use of more protective controls?
- C. Implemented all controls required by applicable OSHA standards and abated recognized hazards, as indicated by the following:
- a. Results of the walkaround inspection portion of the audit?
 - b. Worker reports of hazards?
 - c. Injury and illness data?
 - d. Reports from third party experts?
- D. Installed controls as soon as a hazard is identified?
- a. How are workers protected until controls are installed?
 - b. How is hazard identification tracked?
 - c. How are appropriate controls identified?
 - d. How is the requisition and installation of the controls tracked?
 - e. How are installed controls evaluated to ensure that they remain in place and functional?
- E. Informed workers of the controls that have been implemented for the hazards in their work area?

- a. How are workers informed of the controls in place, and any requirements to ensure that the controls function as intended?
 - b. How are changes in conditions communicated to workers, if the changes affect the hazards and/or the controls?
 - c. Is there a process for employees to provide feedback on the controls implemented?
 - d. Who is responsible for ensuring that controls are implemented and verifying that they are effective?
 - e. What is the process for ensuring that controls remain in place and functional?
 - f. What is the process for tracking the implementation of controls to completion?
5. Education and training. Has the company:
- A. Ensured that workers understand the elements of the safety and health program and how to participate in it?
 - B. Ensured that workers understand the employer's responsibility under the program?
 - C. Ensured that each worker understands his or her own role in the program?
 - D. Ensured that workers understand the procedures for reporting injuries, incidents, hazards, and concerns?
 - E. Ensured that workers know they have a right to participate in the program and report injuries, incidents, hazards, and concerns without fear of retaliation or discrimination?
 - F. Provided an opportunity for workers to ask questions, receive answers and provide feedback during and after training?
 - G. Provided supplemental training when a change in the workplace could introduce new or increased hazards?
 - H. Provided supplemental training when a worker is assigned a new task or given a new assignment?
 - I. Provided training in a language and at a literacy level that all workers can understand?
 - J. Established a system to verify the effectiveness of the training and periodically re-evaluating the effectiveness of the training?

- K. Provided additional training each year, at least during the term of this Agreement, on fall protection, lockout tagout, machine guarding and lead hazards to assure that workers understand the hazards and the methods required to control these hazards?
6. Program evaluation. Has the company:
- A. Conducted an annual review of the program to determine whether all Program elements are fully implemented?
 - B. Involved workers in all Program reviews?
 - C. Established and used appropriate metrics and data to evaluate progress?
 - a. What metrics and data are used to evaluate progress?
 - b. How often are the metrics evaluated to determine progress?
 - c. How are new and obsolete metrics identified?
 - d. How are changes in the metrics communicated to responsible managers and workers?
 - e. Is there a process for workers to provide feedback on the data and metrics used to evaluate progress?
 - D. Determined if progress is being made toward achieving established goals?
 - E. Modified the program as needed to correct deficiencies?
 - iv. How often is the performance of the program evaluated?
 - v. Who performs the evaluation?
 - vi. How are evaluation results recorded?
 - vii. Are previous evaluations used to determine program trends?
 - F. How are potential areas for program improvement identified during the evaluation?
7. Contractor safety. Has the company:
- A. Reviewed all contractor job plans for safety and health hazards, and their prevention and control?
 - B. Informed contractors of the hazards they may encounter during their work on site?
 - C. Required contractors to provide information on the hazards they cause as part of their work?

- a. Are these hazards evaluated for impact on safety in adjacent areas, in addition to the immediate area of work?
- b. How are the potential hazards created by contractor work communicated to a workers?

D. Informed contractors about emergency procedures?

E. Established a reporting mechanism for all contractors to use to report injuries, hazards, and concerns?