



Health & Safety Audits

Pennsylvania Code Title 34, Labor & Industry, Chapter 129, Worker's Compensation Health & Safety, Subchapter F, Workplace Safety Committees



Safety Committee Purpose

- Hazard detection and prevention of workplace incidents and illnesses
- Determine ways to involve employees in safety
- Generate ideas for improving safety & health
- Determine ways and generate ideas to improve employee/management relations
- Get employees interested in safety



Committee Audits By L&I

- Random/Target Audits
- 60-day notification
- Opening conference
- Online Pre-Audit Information Exchange
- Online or on-site audit
- Closing conference
 - Issue Compliant/Non-compliant Rating (Preliminary)
 - Non-Compliant issues explained



The Audit Findings are then forwarded to the Certification Section for corrective action

Frequent Findings



1. WSC membership does not have the correct composition
2. WSC is not meeting each month
3. A Quorum is not present for each WSC meeting
4. Agendas are not prepared for each WSC meeting
5. WSC membership does not represent all primary operations

Frequent Findings



6. Members of the WSC are not receiving required training within each Policy Period
7. WSC member training is conducted but not documented properly
8. WSC training is not conducted by persons meeting Bureau requirements
9. Periodic Inspections of the Workplace are not conducted

Frequent Findings

10. Inspection reports not made part of committee meeting minutes
11. Meeting Minutes are not prepared and posted
12. WSC does not have and/or is not following published By-Laws
13. Contact information not updated in the HandS System



1) Incorrect Composition

IAW 129.1003(d) Must have a minimum of Two Employer and Two Employee Reps:

Employer – Authority to do one or more:

- Select or hire an employee
- Remove or terminate an employee
- Direct the manner of employee performance
- Control the employee

Employee – Does not possess any authority or responsibility described for the Employer

A person cannot function as both of the above

Frequent Findings

1) Incorrect Composition (cont'd)

- Less than four members
- More Employer than Employee Representatives
- Members incorrectly classified



2) WSC must meet each month

- A quorum must meet monthly IAW 129.1005(b)
- Members may teleconference
- Meeting at the end of the month gives little reaction time
- It is better to meet without a Quorum than to not meet at all
- Composition does not equal Quorum
- Companies with seasonal layoffs not meeting during “Off” months
- Schools not meeting during “Summer” months

3) A Quorum is not present for each WSC meeting

IAW 129.1005(b) A Quorum of WSC members must meet monthly

- Defined as a “Majority of permanent WSC members.”
- Must be 51% of WSC membership
- Example = WSC with 6 members = 4
- Does not matter if there are more Employer than Employee Representatives - unless voting
- WSC membership is not clear
- Guests/Alternates are counted at WSC meetings toward Quorum
- There are not 51% of WSC membership present at WSC meetings

4) Agendas are not prepared for each WSC meeting

- WSC is using prior Meeting Minutes for their Agenda
- No agendas are prepared for each meeting
- Agendas are boiler plate with no substance
- Agendas are not circulated for comments by the WSC prior to the WSC meeting

4) Agendas are not prepared for each WSC meeting (cont'd)

- Must develop a written agenda for each WSC meeting IAW 129.1005 (c)(3)
- Agendas need to indicate “New Business”, “Old Business” and “Next Meeting”
- A good agenda will lead to a more productive meeting
- You cannot consider your Meeting Minutes as your Agenda



5) WSC membership does not represent all primary operations

- WSC is “Centralized” but does not have adequate representation for all work activities at each site
- WSC is “Single” but does not have adequate representation for all work activities at the workplace
- IAW 129.1003(c) the WSC membership shall represent all primary operations of the workplace

6) Members of the WSC are not receiving required training within each Policy Period

- IAW 129.1006 the applicant employer must provide adequate, annual training for each WSC member during the Policy Period
- Training must include:
 - (1) Hazard detection and inspection
 - (2) Accident & Illness Prevention & Investigation
 - (3) Other Health & Safety concerns specific to your business

6) Members of the WSC are not receiving required training within each Policy Period (cont'd)

- WSC members are changed during the Policy Period but receive no training
- Management changes regular training dates for WSC based on a Calendar Year, verses the Policy Period
- WSC receives Initial training but is not aware of annual re-certification requirement
- Training is conducted by a WSC member who is not Bureau Approved
- WSC member training is conducted but not documented properly

7) WSC member training is conducted but not documented properly

- IAW 129.1006(e) must maintain the following:
 - (1) The names of the WSC members trained
 - (2) The dates of training
 - (3) The training time period
 - (4) The training Methodology
 - (5) Name/Credential of trainer
 - (6) Name of organization sponsoring the training

8) WSC training is not conducted by persons meeting Bureau requirements

- IAW 129.1006(d) Applicant-employers are responsible for providing verification of trainer qualifications to the Bureau
- You cannot have an employee attend WSC training provided by a Bureau qualified trainer and then use that employee to provide WSC training!

9) Periodic Inspections of the Workplace are not conducted

Periodic Inspections of the Workplace must be conducted by a WSC member:

- Periodic is defined as at least one inspection conducted during the Policy Period.
- IAW 129.1005(3) establish procedures for periodic workplace inspections for the purpose of locating and identifying health & safety hazards



9) Periodic Inspections of the Workplace are not conducted (cont'd)

- WSC counting “Loss Prevention” audit as their WSC Inspection, but having no WSC member involved
- Foreman conducting job inspections which are used for the required inspection, but Foreman is not a WSC member
- WSC not aware of the WSC inspection requirement

10) Inspection reports are not made part of committee meeting minutes

IAW 129.1005 (6) the WSC must establish a system to allow WSC members to obtain:

- (1) Safety related proposals
- (2) Reports of Hazards
- (3) Other information from persons involved in the operation of the workplace



10) Inspection reports are not made part of committee meeting minutes (cont'd)

- There is no discussion in the Meeting Minutes of:
 - (1) Safety related proposals
 - (2) Reports of Hazards
 - (3) Other information from persons involved in the operation of the workplace



11) Meeting Minutes must be prepared and posted

- IAW 129.1005 (5) the WSC must take and maintain minutes of each committee meeting, which the applicant-employer shall review
- Copies of the minutes must be posted or made available for all employees and sent to each WSC member
- Meeting minutes are lacking in content
- Meeting minutes would make no sense to anyone reading them if posted "As-Is"
- Meeting minutes are "boiler plate" with only the date changed

12) WSC does not have and/or is not following published By-Laws

129.1004

- The By-Laws should reflect current WSC operations
- Shall establish procedures that retain a core group of experienced members
- A copy of the current WSC By-Laws are not available
- The By-Laws do not reflect current WSC operations
- The By-Laws do not include procedures for retaining a core group of experienced members

13) Contact information not updated in HandS System

- Audit Findings are emailed to the Primary and Secondary Contacts entered in the HandS system
- If there is a change in this information, it can be updated at any time on your HandS Dashboard after login by selecting “Update Account Information”

Frequent Findings

13) Contact information not updated in the HandS System (cont'd)

User/Contact Information

Title

Primary Contact Person

| | | | | | |
|--------|---------------------------------------|--------------|-------------------------------------|-------------|------------------------------------|
| Prefix | <input type="text" value="-Select-"/> | First Name * | <input type="text" value="Marcus"/> | Last Name * | <input type="text" value="Smith"/> |
|--------|---------------------------------------|--------------|-------------------------------------|-------------|------------------------------------|

Phone Number * EXT

Email Address *

Secondary Contact Person

| | | | | | |
|--------|----------------------------------|--------------|-----------------------------------|-------------|------------------------------------|
| Prefix | <input type="text" value="Ms."/> | First Name * | <input type="text" value="Lisa"/> | Last Name * | <input type="text" value="Smith"/> |
|--------|----------------------------------|--------------|-----------------------------------|-------------|------------------------------------|

Secondary Email Address *

User ID

Password

Confirm Password

Please select a question and provide an answer. This information will be used in case you forget your password. *

Security Answer*

Contact Information



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Questions

