

START WITH SAFETY

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WHAT SHOULD BE INCLUDED IN YOUR WRITTEN PLAN FOR WORKPLACE VIOLENCE?

With the recent occurrence of acts of violence throughout the U.S., OSHA has created the following directive CPL 02-01-058, Enforcement Procedures and Scheduling for Occupational Exposure to Workplace Violence. OSHA believes that a well-written and implemented workplace violence prevention program, combined with engineering controls, administrative controls, and training can reduce the incidence of workplace violence in both the private and public sector. General recommendations for all industries and administrative workplaces include:

Implement Engineering Controls, such as:

- Assess any plans for new construction or physical changes to the facility or workplace to eliminate or reduce security hazards.
- Install and regularly maintain alarm systems and other security devices, panic buttons, hand-held alarms or noise devices, cell phones and private channel radios where risk is apparent or may be anticipated. Arrange for a reliable response system when an alarm is triggered.
- Provide metal detectors—installed or hand-held, where appropriate—to detect guns, knives or other weapons, according to the recommendations of security consultants.
- Use a closed-circuit recording on a 24-hour basis for high-risk areas.
- Place curved mirrors at hallway intersections or concealed areas.
- Lock all unused doors to limit access, in accordance with local fire codes.
- Install bright, effective lighting, both indoors and outdoors.
- Replace burned-out lights and broken windows and locks.
- Keep automobiles well maintained if they are used in the field.
- Lock automobiles at all times.

Implement Administrative Controls to change work practices and management policies in order to reduce exposure to hazards. Such controls include:

- Conduct a workplace violence hazard analysis (this includes analyzing vehicles used to transport clients).
- Provide employees with training on workplace violence.
- Establish liaisons with local police and state prosecutors. Report all incidents of violence. Give police physical layouts of facilities to expedite investigations.
- Require employees to report all assaults or threats to a supervisor or manager (in addition, address concerns where the perpetrator is the manager). Keep log books and reports of such incidents to help determine any necessary actions to prevent recurrences.
- Advise employees of company procedures for requesting police assistance or filing charges when assaulted and help them do so,



if necessary.

- Provide management support during emergencies. Respond promptly to all complaints.
 - Set up a trained response team to respond to emergencies.
 - Use properly trained security officers to deal with aggressive behavior. Follow written security procedures.
- Develop, or improve upon a preexisting, written, comprehensive workplace violence prevention program.

According to CPL 02-01-058, a written, comprehensive workplace violence prevention program should include:

- A policy statement regarding potential violence in the workplace and assignment of oversight and prevention responsibilities.
- A workplace violence hazard assessment and security analysis, including a list of the risk factors identified in the assessment and how the employer will address the specific hazards identified.
- Development of workplace violence controls, including implementation of engineering and administrative controls and methods used to prevent potential workplace violence incidents.
- A recordkeeping system designed to report any violent incidents. Additionally, the employer shall address each specific hazard identified in the workplace evaluation. The reports must be in writing and maintained for review after each incident and at least annually to analyze incident trends.
- Development of a workplace violence training program that includes a written outline or lesson plan.
- Annual review of the workplace violence prevention program, which should be updated as necessary. Such review and updates shall set forth any mitigating steps taken in response to any workplace violence incidents.
- Development of procedures and responsibilities to be taken in the event of a violent incident in the workplace.
- Development of a response team responsible for immediate care of victims, re-establishment of work areas and processes and providing debriefing sessions with victims and coworkers. Employee assistance programs, human resource professionals and local mental health and emergency service personnel should be contacted for input in developing these strategies.

Upcoming Training Events

Office Workstation Ergonomics

August 11, English & Spanish

Management Series: Emergency Action Plans

August 16, English

For more information
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rmsafety@catto.com



CLAIMS CORNER

TEXAS LIGHTNING STRIKE CLAIMS

Lightning damage is the most striking in Texas, at least for the insurance industry. It is one of the most unpredictable and dangerous weather phenomena. It can strike without warning, causing significant damage to property.

The average claim in the state was \$10,671 last year, the Insurance Information Institute said in a statement. That's the highest figure among the 10 states with the most claims, and 44 percent more than the national average.

Being aware of the weather is the number one safety tip when it comes to lighting. Lightning can strike up to 15 miles away from a developing storm, so even if you don't see dark clouds, you could still be in danger. Consider installing a lightning rod on your home. This will draw the lightning to the rod instead of your house, which could save your home from damage or even fire.

If you have active lighting going on around you, make sure to unplug all of your electronics as well. Electronics like TVs, computers, gaming systems, appliances are all potential hazards if lightning hits. Investing in surge-protected power strips is a good preventative measure that will give you peace of mind.

With proper preparation, you can protect yourself and your property from the dangers of lightning.

PREPARING FOR OSHA INSPECTIONS

When an OSHA inspector knocks on the door, you might feel like a driver who just got pulled over by the police. However, OSHA inspectors often view their job as similar to a safety professional's job, with the objectives of protecting employees and ensuring compliance. Although an inspection might feel confrontational, knowing what you should (and should not) do can help make the process go more smoothly.

Greeting the Inspector.

OSHA inspectors will explain why they showed up and what they'd like to see. Your facility might have been selected for a programmed inspection, or for any number of reasons. OSHA might even be responding to a complaint, but don't ask if an employee complained. OSHA will not tell you, and you cannot do anything to that person under whistleblower protection laws. Asking who complained might be viewed as a sign that you intend to identify the person.

Requests for Documents.

The inspector will ask to review various documents, and you must provide what they request within four hours. Some inspectors may allow that time limit to lapse without asking a second time. *Do not* offer documentation that was not specifically requested, but *do* keep a record of everything you've handed over.

The Walkaround.

If OSHA arrived to check a specific area, you can take the long way around, such as going across a parking lot and entering a building using a door near the area of interest.

If you walk the full length of your facility,

OSHA will investigate any obvious hazards along the way.

If OSHA notes any apparent violations, correct them immediately, but do not admit to violations, and avoid making comments such as "that happens all the time."

Answering Questions.

The inspector will ask many questions. Offer concise answers, but do not volunteer additional information unless you're certain it will help. Some inspectors may allow a period of silence, hoping you'll volunteer information during an awkward pause. Don't feel pressured to fill in gaps of silence. Remember that a seemingly casual conversation is actually an interview that becomes part of the official inspection record.

Closing Conference.

After the walkaround, the inspector will hold a closing conference to go over the conditions observed, but the Area Director will mail the actual citations later. Arguing over possible violations during the closing conference could create frustration that results in saying something unintended.

After getting the notice of violations, request an informal conference. You may be able to get some items removed or reduced. *Keep in mind, however, that you have only 15 business days from the date you received the citations to file a notice of intent to contest.*

It may be prudent to prepare your notice of intent to contest, ready to drop in the mail, in case OSHA doesn't respond to your informal conference requests in a timely manner. For more information on your rights and responsibilities, visit:

<https://www.osha.gov/sites/default/files/publications/osha3000.pdf>



Textron All-Terrain Vehicles

Hazard: Crash

KTM North America Closed Course Competition Motorcycles

Hazard: Crash & Injury

Daikin Comfort Tech Evaporator Coil Drain Pans

Hazard: Fire

Crye Precision LRB Leg Loops

Hazard: Fall

Ocean Tech Systems Underwater Communication Devices

Hazard: Injury & Drowning

Aqualung Scuba Diving Computers

Hazard: Injury & Drowning

Westfield Outdoor Tents

Hazard: Injury

The Hammock Source Key West Knock Down Hammock Stands

Hazard: Fall