Audit Inspections and Findings

Often, a company will want to evaluate how well their safety management system is performing. They frequently use audits or inspections to make this evaluation. The data and measurements discovered during audits and inspections are often used to assist a company in determining if they are achieving their safety and health goals, or if they need to establish new goals.

Remember, though, that audits and inspections are only as good as the tools used and the people performing the audit or inspection. If the questions and tools aren't appropriate, then the results and findings will not give your company relevant data to use in making improvements or evaluating compliance. Likewise, if the inspectors and auditors "overlook" items, or if they do not have the appropriate amount of integrity to point out a problem, then the results will be skewed as well.

AUDIT VS INSPECTION

An inspection is different than an audit. The tools are similar, but the processes and how they are conducted make them different. An inspection generally uses a checklist format with "yes/no" answers. The question is asked or the item on the checklist is evaluated, and it either passes the inspection or does not. "Shades of gray" very seldom come into the picture during an inspection. Inspections are usually performed in a very short timeframe (usually between 10 minutes and an hour), and they usually focus on a single item or process.

Audits, however, are more detailed and in-depth, they can take several hours or several days, depending on the scope and depth of the audit. Audits will look at an entire *process* from start to finish, and include reviews of written procedures and observation of tasks as well as an inspection of the equipment and processes to which the written procedures apply. Audits frequently include interviews with employees and document reviews to assure that the steps an operator actually takes are in line with the written procedure (do the procedures say what the operators do, and do the operators do what the procedures says). Additionally, if a procedure is based on a regulatory requirement, an audit will evaluate a written procedure to assure it meets the requirements of the regulations. With an audit, there is frequently a question checklist that determines if the topic "meets compliance", "needs improvement", "does not meet compliance" or is "not applicable". Audit tools will generally be more "squishy" to allow for the auditor to probe deeper into the process to determine if it complies, and to what degree it complies. Audit tools and questions are seldom in a yes/no format, and the tools are designed so that auditors ask open-ended questions that allow for the operator to elaborate on what they do and how they do it. Audit findings are generally more detailed in nature and point out specifically what is required and what parts of the process are out of compliance (hence the availability of the "needs improvement" determination).

PRIORITIZING FINDINGS

Inspection findings are fairly easy to prioritize and fix. Either the equipment or process is in compliance or it is not. The inspection questions are generally straight-forward

enough that the solution to the problem is fairly evident and management will know (or should know) how to address the finding.

Audit findings, because they are frequently based on regulatory compliance, or based on written documentation, are sometimes more difficult to prioritize, hence, the need to prioritize the findings into categories. Throughout industry, audit categories are generally placed into one of four categories.

The first category is "major" or "serious" findings. These are findings that if not addressed will lead or will very possibly lead to a workplace injury or citation by a regulatory authority (such as OSHA). These are the first priority for a company to address. An example of a serious finding is that no lockout/tagout program or equipment is used when a machine is being serviced or repaired, or that a saw does not have the required guarding in place during use.

The second category for findings is "somewhat serious or somewhat major". These types of findings can be serious if something out of the ordinary or of a non-routine nature happens. Frequently these types of findings are based on "what if" scenarios. What if acid was added instead of the neutralizing basic solution in step 3 of the process, or what if the chemical tank leaks, or what if the machine is activated during a lockout/tagout? Often these types of situations and "what if" scenarios are addressed by redundant safety features in a process or on a piece of equipment, but these secondary safety features must frequently be in place, as human error, leaks and equipment failures do occur. Companies address these findings after all the first priority "serious or major" findings have been addressed.

The third category is "minor" findings. These are frequently small items that are easily overlooked. Examples include items where the documentation does not exactly match what an operator does. During an audit, this difference would be noted. Frequently, operators have already come up with safety solutions to address a concern, but the documentation was never changed or updated. A minor finding might be that not every employee was provided their annual refresher training for hazard communication (two employees were out sick when the training course was provided, and they got overlooked). A minor finding might be that the OSHA 301 form for the business was not visibly posted for the entire time required (Feb 1st through April 30th) because other employee notices were posted on top of the form.

The fourth category is "awareness required" findings. These are simple errors, usually in documentation (spelling, grammar, references that do not take you directly to where you need to be, or incorrect dates). Awareness findings could also be errors where the auditors or inspectors feel that management should be aware of something, but it does not really pertain to the scope of the audit. For example, your company has chosen to exceed regulatory requirements and paint all the fire protection piping in the building red, so that fire-fighters and employees know which lines are dedicated to sprinklers or to standpipe systems. An auditor is reviewing a chemical process where a chemical is piped to a tank and this pipe runs along or near the fire protection lines. The auditor discovers that the

fire protection pipe was not painted red in this instance and could point it out as an "awareness" finding.

WHAT TO DO WITH THE FINDINGS
The findings generated from an audit or inspection will point out errors or hazards presented by the process or by the equipment. They will not point out the solutions to the problems, only the problems themselves. It is up to the company management to address the findings and improve safety and health in the workplace. Frequently, management will appoint someone to oversee the implementation of improvement projects that are determined based on the findings.

Occasionally, there are a great many findings, many of which have simple solutions that can be easily and inexpensively addressed. These "low hanging fruit" can be "picked off" without difficulty, and addressing these easy items first is a great way to begin the process of making changes in the workplace to improve worker safety. Some of the more in-depth or more expensive items should be addressed as formal safety improvement projects.

These more formal projects should include members of both management and operators. Companies are frequently surprised at the creative (and less-expensive) options employees can come up with to improve safety hazards. "Because it has always been done this way" is not an appropriate reason to not improve processes and make equipment safer. Employees generally have great ideas, but management holds the purse strings. Look at several options as solutions and pick the best one that makes good business sense. (The Job Hazard Analysis tool provided in module 2 of this training program is an excellent tool to assist in the process of determining what the potential solution options are to a problem.)

SUMMARY
Evaluating the workplace through audits and inspections is the best way to evaluate the safety performance of a company. Not every company needs a full audit, and many companies need more than just an inspection. Based on the type of business you have, and the equipment and processes your company uses, choose the tool that works best for your business. Perform a baseline audit or inspection. Make some improvements and then perform the same audit or inspection again after a determined period of time (usually 6 months as an initial re-do, then once per year after that is recommended). Full audits should be done at least every 3-5 years to assure that the company is in compliance with applicable regulations and that the required written documentation is in place and utilized.