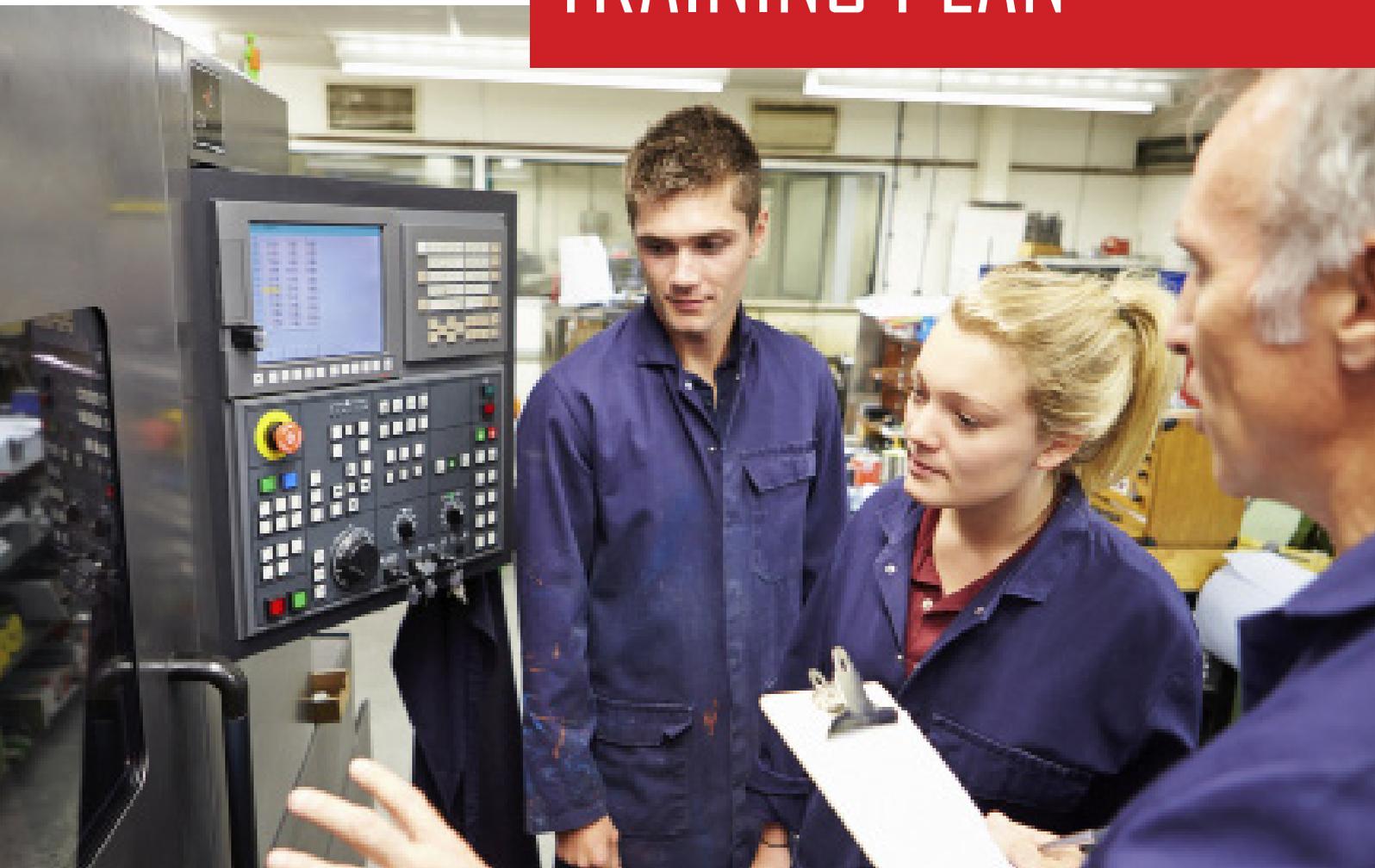


BUILDING A SAFETY TRAINING PLAN



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HOW TO START A SAFETY TRAINING PROGRAM

Training is an important part of any safety program. Training helps teach employees how to perform their work more safely. It also allows you to teach employees the company's policies and attitudes about on-the-job safety.

Setting up a training program may appear to be difficult and overwhelming. But this does not have to be the case. The first thing that needs to be done is to determine the important safety issues for your employees. You can use resources in your workplace to gather this type of information. Top among these tools are the incident reports that your facility generates about employee injuries. This will give you an idea not only of where employees are having problems, but also what kinds of problems they are having. For example, are your workers reporting a lot of foot injuries? Do they need to be trained on the importance of wearing steel-toed shoes? Are they experiencing a high number of eye injuries? Do they need to be educated on the importance of wearing eye protection and what types of eye protection are best

for their jobs?

There are other good ways of collecting information to use in safety training. For example, if you perform routine audits of the workplace, you could make observations about the way employees are doing their jobs and how they could do them more safely - without pointing fingers, of course.

Sometimes safety training comes from regulatory requirements put out by agencies such as the US Occupational Safety and Health Administration (OSHA) or Occupational Health and Safety (OHS). For example, do your workers drive forklift trucks? If so, they'll need training in how to operate those vehicles in a safe manner. Do your employees need to wear respirators to do their jobs? They'll need a lot of training and review on fitting, testing and using respiratory protection.

Once you've decided on the material to include in a safety program, there are some other things you might want to think about:

- **How do you ensure that employees are actually learning something?** One way is to follow the training with a short, but realistic quiz on the information they have just been trained in. This is an effective tool to judge how effective the training is and whether the employees have actually benefited.
- **Safety training works best if given to employees at a convenient time, whether it is at the start, middle or end of a shift.** No matter when you schedule the training, try and provide some drinks and snacks to help lure workers to the site. Of course, safety training should be mandatory, and you should keep records of who attends, but it should also be enjoyable for both the employees and the person giving the training.

- **Safety training should not be a “one shot” deal.** Periodic training on the same and related topics is a good idea. It gives you a chance to review the information that you've covered before. It also gives you a chance to expand the employee's knowledge base, while updating any new methods or techniques.
- **The person giving the training should be knowledgeable and up to date on the safety aspects of the jobs performed in your company.** This person does not have to be a know-it-all but this person needs to be open, honest and knowledgeable. Safety training is an important part of any safety program. Use the tools available to determine what training is needed.



WHY YOU SHOULD DOCUMENT YOUR SAFETY TRAINING

Companies that deliberately cut corners on safety training deserve no sympathy if they get socked with an OSHA/OHS citation. Unfortunately, it's not just the "bad guys" who get into trouble. Companies that make a conscious effort to train still end-up getting cited for training violations. These companies learn a painful but important lesson: It's not enough just to train your workers; you must also be able to prove that you do. And that's not all. In many cases, you need to take steps to verify that workers understood the training you provided.

you can't prove that training was provided, you'll almost surely be cited. And if you don't have documentation, you're unlikely to be able to prove that the worker received the necessary training.

A TALE OF TWO COMPANIES

Here's a demonstration of why documentation is so important.

Company Fined Because It Can't Document Training

During a routine inspection, an OSHA investigator smelled sewer gases in a trench and discovered that none of the workers knew they should check for poisonous gases or determine if the air in the trench had enough oxygen. The contractor in charge of the excavation was fined \$2,500 for failure to train workers how to recognize and avoid unsafe conditions. The contractor appealed, claiming that he had trained the workers. But he didn't have the documents to prove it. So the Occupational Safety Health Review Commission (OSHRC) upheld the fine.

Company Avoids Fines Because It Can Document Training

A Ministry of Labour investigator interviewed the victim of a serious workplace incident in Ontario. The victim said the company had never trained her and that she didn't know about the hazard. But the company had written records showing that training sessions were held and that the victim had attended them. When she saw her signature on the attendance sheet, the victim suddenly "remembered" that she had been trained, after all, the company's safety director relates. No citations were issued.

“

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”

THE IMPORTANCE OF DOCUMENTATION

There are more than a hundred standards that require a company to provide safety training to workers. Some, but not all, of these standards also require the employer to document that training.

But, as a practical matter, documentation is required even if the standard doesn't expressly mention it. That's because if investigators show up after an incident, one of the first questions they'll ask is whether the injured worker (and/or worker who caused the injury) received the required training. If



HOW TO DOCUMENT COMPLIANCE WITH TRAINING REQUIREMENTS

Companies that deliberately cut corners on [safety training](#) deserve no sympathy if they get socked with an OSHA citation. Unfortunately, it's not just the "bad guys" who get into trouble. Companies, like yours that make a conscious effort to train still end up getting cited for training violations. These companies learn a painful but important lesson: It's not enough just to train your workers; you must also be able to prove that you do. And that's not all. In many cases, you need to take steps to verify that workers understood the training you provided. Here's how to document your training efforts.

THE IMPORTANCE OF DOCUMENTATION

I'll bet this isn't the first time somebody has told you to document your training efforts. But here's a demonstration of why documentation is so important just in case you didn't take the message to heart. It's a tale of 2 companies.

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enough oxygen. The contractor in charge of the excavation was fined \$2,500 for failure to train workers how to recognize and avoid unsafe conditions. The contractor appealed, claiming that he had trained the workers. But he didn't have the documents to prove it. So the Occupational Safety Health Review Commission (OSHRC) upheld the fine [*Sec'y of Labor v. J. Mess Plumbing Co., Inc., OSHRC Docket No. 04-0197*].

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An OSHA inspector interviewed the victim of a serious workplace incident in Michigan. The victim said the company had never trained her and that she didn't know about the hazard. But the company had written records showing that training sessions were held and that the victim had attended them. When she saw her signature on the attendance sheet, the victim suddenly "remembered" that she had been trained, after all, the company's safety director relates. No citations were issued.

WHAT TO DO TO DOCUMENT TRAINING

Proving training is not something you can do at the last moment after an OSHA inspector shows up. "Trying to pull together the training records is very difficult after the fact," warns a Georgia lawyer. You need a proactive

strategy to document key information about each training session. A training log should be a big part of that strategy. Let's talk about how to create one.

In addition to documenting compliance with training requirements, keeping a training log can help you:

Cut Injuries: Having a written record showing the training each worker has received and when enables you to check if workers are qualified to do the jobs you assign them. This is important because it's easy to lose track of what jobs an individual worker has been trained to perform. You can also use the logs to diagnose hazards or patterns of injury more effectively. For example, if a series of incidents occurs, you may discover by analyzing the training logs that all of the victims were trained by the same foreman and that you need to relieve the foreman of further training duties.

Comply With Retraining Requirements: OSHA requires you to retrain each worker periodically (typically no less than once a year). You must also retrain workers before they begin a new job if their new duties expose them to hazards for which they haven't received the appropriate training. Employers may forget about retraining or lose track of when they last provided the worker training. Training logs can help avoid these mistakes because they show when initial training was provided and when retraining is due.

Document Certification: Some OSHA standards, such as Personal Protective Equipment and Powered Platforms, require verification of training. There has to be a written certification of training for each worker. To prepare this certification, you must have a written record of who was trained, on what date and by whom. This is where training logs can make a huge difference. Even though the actual certification goes to the worker, you need to keep a record of the information it's based on for your files.

HOW TO CREATE A TRAINING LOG

A training log doesn't have to be elaborate. But it does have to capture the right information. Your training log should include:

- The worker's name;
- The subject of each training session;
- The dates of each training session;
- The dates of each retraining session;
- Signatures or initials of each trainer; and
- Whether the worker received a certification required by the OSHA standards.

HOW TO USE YOUR TRAINING LOG

Once you create the log, have your supervisors fill out a separate training form for each of their workers. Each time they create or update a training form, they should keep the original and send a copy to:

- The safety director, to keep in a central employee safety training file; and
- The personnel department, to keep in the worker's personnel file.

This should ensure that your logs are complete and on hand when and if an OSHA inspector demands to see them.

CONCLUSION

Safety training is a fundamental requirement of occupational health and safety laws. But providing safety training isn't enough to ensure compliance. You must also be able to document your training efforts. And even that is not enough. Employers must be able to prove not simply that they delivered training to their workers but that they took steps to verify its effectiveness.

DOWNLOAD COMPLIANCE TRAINING LOG





PLAN FOR THE EXPECTED OR UNEXPECTED

IF YOU FAIL TO PLAN, YOU PLAN TO FAIL.

Procedures and rules are in place to address emergency situations. Employees must be properly trained on the procedures. You must take a proactive approach to planning for the unexpected and take steps to ensure employees know what to do in an emergency. Injuries and damage will then become minimal. If plans are not in place or not followed, injuries, property damage and possible loss of business can result.

TRAINING IS A KEY TO PREVENTION.

Safety training is not always the most enjoyable event in our lives. However, your life and the life of your crew often depend on the information presented in the safety training programs at your facility. Safety training is required to help make you aware of the hazards in your environment and to teach you what to do in an emergency situation. In turn, you can pass this information on to your team members.

EMERGENCY SITUATIONS HAPPEN WITHOUT NOTICE.

The ideal safe environment would include a warning system to alert us of an emergency and give us time to react before the emer-

gency occurs. In real life, this is not the case. In most emergencies you have very little or no warning before it occurs. Therefore, you do not have time to make emergency preparations during the emergency. Know what to do in an emergency every minute you are at work. Know the potential emergencies that could occur in your environment and know what to do if an emergency situation happens.

IN AN EMERGENCY YOU MUST TAKE IMMEDIATE ACTION.

If a situation occurs in your workplace that could cause injuries, production loss, or damage you must be trained to take immediate action. Situations such as a chemical spill, flammable gas release, water on the floor, or toxic gas release require immediate action and implementation of established emergency plans in order to prevent serious injuries and property loss.

Much of the work we do in safety is designed to help prevent injuries in every-day operations. However, part of safety involves planning for the unexpected and knowing what to do if it does happen.

IN DANGEROUS JOBS, HANDS-ON SAFETY TRAINING WINS HANDS-DOWN

If you want your workers to improve their safety behaviour while performing highly hazardous jobs, there's nothing more effective than hands-on safety training, according to the American Psychological Association (APA).

APA researchers analyzed results from 113 safety training studies conducted since the passage of the Occupational Safety and Health Administration (OSHA) Act in 1971.

They found that at jobs where the likelihood of death or injury was highest, more engaging training—including behavioural modeling, simulation and hands-on training—was the most effective way to help workers learn about and demonstrate safety on the job.

However, the researchers determined that when employees are performing less dangerous jobs, less engaging training methods, including lectures, reading materials and videos, are equally effective in improving safety outcomes.

Burke says while there's no question that workers learn from videos, the key point is that when hazards are particularly ominous, the less engaging forms of training (lecture-based, video or distance-based learning) produce only about 50 percent of the knowledge gain and performance improvements realized from highly engaging training.

"In a more interactive training environment, the trainees are faced more acutely with the possible dangers of their job and they are, in turn, more motivated to learn about such

dangers and how to avoid them," says lead study author Dr. Michael Burke.

For example, when hazardous events and exposures are extreme, including fires, explosions, exposure to toxic chemicals or radiation, more interactive training creates a sense of dread and realization of the dangers of the job, says Burke.

“

To us, dread—or an understanding of threat vulnerability and uneasiness related to the possible threat—only develops through the employee's action or seeing someone else in action, discussions with others, and thinking about how to avoid the hazard.

”

Burke believes there's a shortage of hands-on training for workers who could benefit the most from it. He says research has shown that workers who face particularly ominous hazards often are not receiving more training than workers in other types of jobs.

The researchers analyzed a sample of 24,694 workers in 16 countries. They used the Bureau of Labour Statistics Occupational Injury and Illness Classification System to sort hazards into categories that reflected the increasing potential for severe illness, injury or death.

The hazards ranged from simple falls to fires, explosions and physical assaults.



WHY SIMPLY PROVIDING TRAINING ISN'T ENOUGH

Delivering safety training isn't enough; to comply with training obligations, you must also verify that workers can understand and apply the training they receive. This story will explain the obligation and how to meet it.

WHAT OSHA REQUIRES

OSHA generally requires employers to ensure that workers get the training they need to do their jobs safely. More than 50 OSHA standards pertaining to general industry spell out specific training requirements.

Some standards, e.g., process safety management, PPE, powered mobile trucks and confined spaces, expressly require verification of the effectiveness of training in some form, such as by making employees demonstrate the skills in which they were trained. But the way the OSHA officials who enforce the law interpret it, the obligation to ensure that training is understandable and understood is clearly part of the requirement.

Concrete Company Fined for Not Verifying Training

Thus, when OSHA says you must provide training, it means you must provide effective training. Many companies have learned this lesson the hard way.

Example: A crane operator and rigger who was less experienced were moving a stack of concrete pilings, each weighing approximately 6,000 pounds. Because his view was obstructed, the crane operator simply placed the pilings where the inexperienced rigger told him they should go. After he drove away, all of the pilings fell. When he left his crane to investigate, he saw that the rigger had been crushed to death. OSHA fined the company for failing to implement adequate training and work rules to ensure that workers knew how to perform their jobs safely.

The company had given each new worker a safety manual and on-the-job safety training. It also held weekly tool box safety meetings

and thought it was doing enough to make sure workers understood how to perform their job safely. But it never tested them on what they knew. During the 5 months that the inexperienced rigger had been on the job, he received at least one written reprimand for putting too many pilings on a stack and creating the risk that they would fall. The company also wrote him up for safety lapses on at least 2 other occasions. But it never gave him additional training because nobody knew that he didn't know how to do his job properly — they just thought he was slacking off. If someone had taken the time to verify whether the rigger understood the correct way to stack concrete pilings, the incident could have been avoided [*Secretary of Labor v. Gary Concrete Products, Inc.*, OSHRC Docket No. 86-1087 (May 16, 1991)].

Signed Acknowledgement Isn't Necessarily Proof

Some companies ask their workers to sign a form after training sessions acknowledging that they understood the lesson and will put it into practice. Don't let these forms lull you into a false sense of security. "Most workers will just sign these things without even reading them, let alone making sure that they understood everything you told them," says a health and safety attorney in New York City. This is especially true if the training and instructions are complicated.

Example: A worker was hit on the head with a falling bucket while installing a storm pipeline in a drainage ditch. OSHA inspected and cited the employer for not having an adequate protective system to guard against cave-ins. The employer contested the citation. Besides, it argued, if any violation occurred it was because the foreman didn't follow safety rules. The court upheld the citation. The employer did in fact put its trenching rules in the safety manual and required foremen to sign a form acknowledging that they read and understood the manual. But the rules were complicated and a signed acknowledgement form wasn't enough to

prove they were adequately communicated, said the court [*Complete General Const. Co. v. OSHRC*, 2005 U.S. App. LEXIS 5197 (6th Cir.), March 29, 2005].

CONCLUSION

Attendance sheets showing that safety talks were held, signed forms acknowledging that workers "read and understood" written documents and similar materials may demonstrate that training was provided but don't prove that it was effective.

HAZARD COMMUNICATION



DOWNLOAD TRAINING QUIZ

QUIZ TO VERIFY WORKERS UNDERSTAND THEIR TRAINING

OSHA has made it clear that simply providing safety training and information isn't enough. You're also expected to ensure that such training and information is understandable and understood by the workers.

DOWNLOAD



DOES SAFETY TRAINING HAVE TO BE MULTILINGUAL?

Make sure you translate training sessions into the language of non-English speaking workers. Otherwise, you'll be in violation of OSHA's safety training requirements.

WHAT OSHA REQUIRES

The OSHA laws say that employers must provide workers with appropriate safety training and information; they don't specify the language such training and information must be provided in. However, what matters is not what the laws say what they mean in practical application. In the context of OSHA training, employers have an obligation to provide safety training and information in the language their workers speak and understand.

OSHA confirmed this in a 2010 Training Standards Policy Statement. "OSHA has a long and consistent history of interpreting its standards and other requirements to require employers to present information in a manner that their

employees can understand," according to the Statement.

The Statement then goes on to cite a 1998 OSHA Interpretation letter that "instruction employers must provide (under Hazcom) must be tailored to the employee's language and education."

Employer Fined for Not Providing Training in Albanian

This isn't just a theory. In 2002, OSHA actually fined a plumbing company \$4,000 for failing to train non-English speaking workers how to recognize unsafe working conditions at an excavation site. OSHRC upheld the fine.

The company had argued that it provided safety training to each worker—in English. But most of the workers were from Bosnia or Albania and didn't speak English (except for one person, the job foreman). The owner didn't provide a translation or verify that

somebody else had translated the safety instructions into Serbo-Croatian or Albanian so the workers could understand it. Even worse, the company couldn't plead ignorance of the legal requirements since it had been previously cited for not translating training sessions for non-English speaking workers [*Sec'y of Labor v. Kokosing Construction Co., Inc., OSHRC Docket No. 00-2190 (Sept. 12, 2001)*].

4 THINGS TO DO

There are 4 things you need to do to ensure compliance with this implied obligation of rendering training to foreign workers understandable:

STEP #1: DETERMINE LANGUAGES USED IN WORKPLACE

First you need to first determine the languages your workers understand. Then you can tailor your efforts accordingly. For example, if half the workforce speaks and understands English and the rest speak and understand Spanish, you'll know to, say, translate your company's safety policies and rules into Spanish.

You can't address only the dominant languages spoken in the workplace. Even if only one worker speaks a certain language, you must still ensure that that worker gets appropriate safety training and materials in that language.

STEP #2: USE PICTOGRAMS

If you've determined that a variety of languages are spoken in your workplace, try to cross language barriers by using pictograms whenever possible to provide safety information. A pictogram is a graphic symbol or picture that represents an idea. Effective pictograms are simple and easily understood by workers. Hazcom warning labels are good examples of pictograms. Others: Posting pictures of hard hats or safety glasses

in areas where workers are required to wear those items or pictures of cigarettes with a line through them in no-smoking areas.

Try to use pictograms that will be universally understood—and that take into account not only language but also cultural differences. For example, the symbol for first aid in Western culture is a red cross. But in other cultures, it's a red crescent moon.

STEP #3: HAVE TRANSLATORS PROVIDE INFORMATION VERBALLY

Some information simply can't be provided using pictograms. For such information, have translators who are fluent in the applicable languages verbally translate that information for workers. You can either use outside translators or in-house workers or supervisors who are fluent in the relevant languages.

STEP #4: PROVIDE WRITTEN INFORMATION IN RELEVANT LANGUAGES

If necessary, be prepared to provide written safety information in the foreign language(s) spoken by workers who need the information.

TRAINING FOLLOW-UP VERIFICATION FORM

EMPLOYEE'S NAME: _____

SUPERVISOR'S NAME: _____

Safety Meeting Topic	Method Used to Verify That Worker Understood Topic	Date of Verification	Additional Training Necessary?	Date of Additional Training
	<input type="checkbox"/> Observation <input type="checkbox"/> Interview <input type="checkbox"/> Quiz <input type="checkbox"/> Other: _____	MM/DD/YYYY	Y/N	MM/DD/YYYY
	<input type="checkbox"/> Observation <input type="checkbox"/> Interview <input type="checkbox"/> Quiz <input type="checkbox"/> Other: _____	MM/DD/YYYY	Y/N	MM/DD/YYYY
	<input type="checkbox"/> Observation <input type="checkbox"/> Interview <input type="checkbox"/> Quiz <input type="checkbox"/> Other: _____	MM/DD/YYYY	Y/N	MM/DD/YYYY
	<input type="checkbox"/> Observation <input type="checkbox"/> Interview <input type="checkbox"/> Quiz <input type="checkbox"/> Other: _____	MM/DD/YYYY	Y/N	MM/DD/YYYY

**DOWNLOAD TRAINING
VERIFICATION FORM**





SAFETY TRAINING: ONCE IS NOT ENOUGH

Being experienced in your work does not provide immunity from injuries. Nearly a quarter of acute injuries happen to experienced workers—as a result of human errors.

Statistics like this remind us of the need for continued safety training. Refresher courses, new training with new information and regular safety reviews are all necessary to keep you safe from workplace injury.

Near misses or minor incidents indicate something is wrong with the way you are working. Or perhaps it has simply been a long time since you covered the material. You may have forgotten some of it, or there may be new information or new methods to make it easier to understand.

HOW CAN YOU UPDATE YOUR SAFETY TRAINING?

- **Ask for a review.** Go to your supervisor, qualified co-workers and company's safety department with specific questions you need to have answered.
- **Use the company's library of safety resources.** Self-directed study workbooks and CD's, safety booklets and videos are some of the ways to learn and review the information. If you are not familiar with computers, start with an easy course while you learn to navigate.
- **Use your breaks for safety reading and discuss it with your co-workers.** Encour-

age your company to supply safety literature in the break rooms. Help set up a television and video player in the lunch room for safety presentations.

- **Read again the information presented to you when you started your job.** It will make much more sense the second time around. This could include your company's safety policies and procedures, emergency instructions, operating manuals for equipment, Material Safety Data Sheets and labels for chemicals in your work area.
- **Ask for cross-training in other jobs.** You will look at hazards and safety procedures from a new perspective.
- **Take the materials home to your family if you are allowed to.** Make your safety training a household project. This will give your family members a better understanding of what you do, and they will encourage you to work safely.
- **Ask for help with advanced training and education if you are interested.** Your company might have a budget for sending you to safety conferences or technical courses. Even if no financial help is available, the department might be able to schedule your shifts to accommodate learning. Consider distance learning, in which you communicate by computer, television and mail.



4 THINGS YOU CAN DO TO MAKE SURE YOUR WORKERS "GET IT"

OSHA requires not just providing but ensuring the effectiveness of their safety training. How should employers document the effectiveness of their training programs? Here are 4 suggestions:

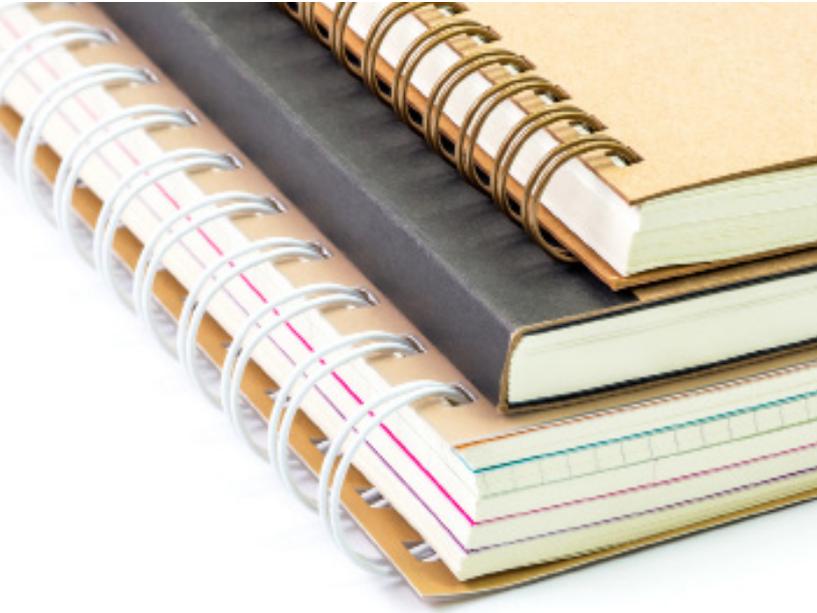
1. POST-TRAINING QUIZ: Have workers take a quiz after the training session to test their understanding. Workers who don't score a certain percentage should get additional training. Repeat the quiz a few weeks or months later to ensure that workers retain what they were taught.

2. PARTICIPANT DEMONSTRATIONS: After you explain the right way to perform a job, get the worker to show you how to perform it. For example, watch whether forklift operators are stacking pallets the right way and driving safely. "Simply asking the worker whether he understands what you told him isn't enough," says a safety consultant from Syracuse, NY. "A lot of times, workers will tell you that they understood what you said even if they didn't, either because they don't want to seem dumb or because they want to get training over with." But with a demonstration workers can't hide what they

did and didn't absorb. Actual performance of the technique is also a pedagogical device. "Demonstrating the technique shows the worker how to perform it better than anything else," notes the Syracuse expert.

3. POST-TRAINING EVALUATION: You should have some form of evaluation to get worker feedback on the training. There are lots of different techniques – interviews, questionnaires, focus groups and even informal chats. One expert says she requires workers to fill out a Comprehension & Understanding form.

4. POST-TRAINING OBSERVATION: The only sure way to determine if training is effective is to observe what the workers do when they get back to the jobsite, according to one consultant. For example, if you're training on lockout/tagout and 3 days later you observe workers locking out their machines before cleaning, it's a sign that they remembered something from the training program you just held. If you see them doing the same thing 3 months later, it's a sign that your training was effective.



Quick QUIZ - The Right & Responsibility To Work Safely

1. Who is responsible for safety in your workplace?
 - a. Management
 - b. Employees
 - c. You
 - d. Everyone

2. Failure to report a hazard could set someone else up for an injury.

True or False

3. You should regularly inspect any equipment and tools you use.

True or False

4. Checklists can be useful in doing equipment inspections.

True or False

5. If you do not understand something about work safety, you should:

- a. Ask about it
- b. Pretend you know all about it

6. Have you met anyone on your safety and health committee?

Yes or NO

7. The only place you can pick up safety information is from a formal training program.

True or False

8. Do you have any safety concerns about your job?

Yes or NO

9. What are you going to do about them?
-

10. Safety is:
 - a. Your right
 - b. Your Responsibility
 - c. Both

CONCLUSION: KEEP FORM DOCUMENTING VERIFICATION METHODS

Keep documentation of the methods they used to verify that workers understood their training program. To meet this requirement, prepare a form for each worker that lists the methods that you used to make sure your safety message sunk in. Be sure that your form describes:

- The training subject for which worker understanding was verified;
- The method of verification;
- The date that the verification took place; and
- Whether additional training is necessary and if so, the date on which such training was provided.

Keep the form in each employee's personnel or training file and update it every time you provide additional training or re-test a worker.

Answers: 1. D 2. True 3. True 4. True 5. A 7. False 10. C