



The Training Dilemma

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Ask anyone in the construction industry: What is the most challenging aspect of maintaining a successful health and safety program? Most likely the answer received is employee training. With effective training, the other program aspects come together more easily. If knowledge is power, safety training is a tool that can be used to empower employees in the field to recognize hazards and find safer alternatives to getting the job done. Many health and safety studies have linked an increase in employee awareness of jobsite hazards to a decline in accidents, both in frequency and severity.



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Newsletter Spotlight

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OSHA spells out very clearly in their construction regulations (29 CFR 1926.21):

The employer shall instruct each employee in the recognition and avoidance of unsafe conditions and the regulations applicable to his work environment to control or eliminate any hazards or other exposure to illness or injury.

Adequate employee training not only reduces workplace accidents, but it also promotes an effective health and safety program, increases workplace morale, lowers insurance costs, and demonstrates a good faith effort on behalf of an employer. If an employer takes the time and resources to educate employees about jobsite hazards with the intent of preventing dangerous conditions, employees are more likely to feel a greater sense of ownership in the work they are conducting.

From a regulatory standpoint, questions regarding employee training are considered in almost every OSHA inspection where alleged violations have occurred. Compliance officers may request training documentation after observing violations. In a private interview, the compliance officer may also determine that an employee lacks the necessary safety knowledge to perform their job tasks. The lack of training for precise hazards where OSHA standards specifically spell out the requirements may also warrant the issuance of further alleged violations.

In many cases, where serious or fatal accidents have occurred, OSHA has found that inadequate training was one of the root causes. When investigating any accident, this is typically one of the first questions asked. Even in cases where training documentation is provided, the nature of the accident and lack of individual employee knowledge may indicate the training was insufficient and retraining should be required.

For every construction company, there are many barriers to having an effective safety training program. Scheduling conflicts with a dynamic workforce, adult education and language barriers, finding qualified and knowledgeable trainers, and completing training (or retraining) when required, are all substantial hurdles that must be overcome to provide employees with the necessary information needed to perform their jobs.

Scheduling conflicts with a dynamic workforce

The majority of construction firms operate at various jobsites, either regionally or nationally. When jobsites are spread among various locations, employees might potentially be away from home as well, staying in hotels or in remote areas. Gathering employees to assemble in one place or another can be extremely challenging.

There are many options with a mobile workforce. A traveling trainer could visit the jobsites at different times, a trainer could conduct required training during the slow season or during non-work hours, or some form of online training may be the only feasible solution.

One issue that can arise from online training is OSHA's view as it relates to this being the only method used. In a Letter of Interpretation (November 22, 1994), OSHA states "the use of computer-based training by itself would not be sufficient to meet the intent of most of OSHA's requirements." It continues with saying that "an effective training program, it is critical that trainees have the opportunity to ask questions where material is unfamiliar to them."

Adult education and language barriers

Trainers should be available to organize the training in a manner that is understandable to every employee. Having trainees retain the information is the most important goal of any trainer. Most trainees are not accustomed to sitting and listening to lectures for long periods of time. Dr. Earl Blair CSP, Program Director for Safety Management at Indiana University in Bloomington, recommends "breaking the training up so they aren't doing something passively for an extended period of time." This may include telling stories, reviewing case studies, having trainees provide recommendations to safety problems, or even hands-on applications of the material. "Go five to ten minutes of lecture, allow for questions, and then move to more interactive methods. That engages the trainee's mind, and research shows that it will make it stick." The end result is that "they are more likely to apply what they have learned once they get back on their job."

OSHA has, on numerous occasions, stated that non-English speaking employees must to have materials presented in a language they can understand. It is preferable that the trainer is bi-lingual, in order to minimize the distraction of having to wait for a translation, but in class translations may be the only option. Since some words or phrases do not easily translate into other languages, the translator should be allowed to review the materials prior to the training session so they are able to correctly convey the meanings.

Dr. Blair emphasizes that "OSHA recommends having a homogeneous class, both in language and employment levels." This allows the trainer to focus on a particular group of individuals and maximize their effectiveness. Managers and front line employees should attend separate training courses, as the focus is not the same for the different types of work.

Finding knowledgeable and qualified trainers

Safety trainers, regardless of whether they are from a third party resource, your company safety director, or an experienced in-house employee, must be knowledgeable in the topic they are presenting. OSHA often uses the phrase "qualified in the subject matter to identify hazards" when describing trainer qualifications.

Dr. Blair emphasizes that the training must be effective, and the trainer must have a combination of good presentation techniques and job knowledge or experience. Individuals experienced in the job being performed "usually have the respect of their peers. But, even the most experienced person may not have the presentation skills necessary to facilitate the learning. Some folks have the expertise, but they aren't good at training. And some may be the opposite." So the goal is to find trainers with a good combination of both qualities.

The effectiveness of a trainer goes a long way with not only retention of knowledge, but also with employee buy-in of the safety program. The most effective trainers get the entire class involved in discussion, which goes a long way with individual employees to give them that feeling of ownership.

Completing training with frequency guidelines

When a new employee is hired, they must be provided with adequate safety training prior to being exposed to such hazards. Having some form of New Hire Orientation is crucial to ensure new employees understand the dangers their new job will present. In OSHA's publication *Training Requirements in OSHA Construction Industry Standards and Training Guidelines*, they state "Many researchers concluded that those who are new on the job have a higher rate of accidents and injuries than more experienced workers."

Some standards are very explicit in detailing how often current employees have to be trained. Asbestos Awareness, HAZWOPER, Lead, and Bloodborne Pathogens, just to name a few, have annual training requirements. In many of OSHA's standards there is no frequency requirement. Refresher or retraining is often a topic covered in the standard, but it is usually in relation to new task assignments, introduction of new hazards, or where an employee demonstrates they have not retained the information.

In a particular example, OSHA stated in a Letter of Interpretation (February 23, 2000), "you do not need to retrain employees who work on scaffolds as long as you determine that the employee possesses the proficiency required by the pertinent provisions of Subpart L." As a responsible employer, you would not need to completely retrain these employees, but you should have some basis of testing their knowledge to prove this determination. Possibly, what a specific employer considers adequate knowledge may not mean OSHA will agree, especially if a violation has occurred. Erring on the safe side, and providing regular refresher training is always the proper due diligence of any employer.

So, as we ask ourselves, what is the most challenging aspect of maintaining an effective health and safety training program? We are able to answer that employee training can be difficult, but there are ways to bridge the gaps. Addressing logistical problems, language and education barriers, trainer qualifications, and frequency issues are all challenges that every employer must find their own unique solutions for. Even though training employees may be time consuming and could require additional resources, it is always money well spent.