Preparing for off-site interviews and on-site inspections

Garrett Brown, MPH, CIH Maquiladora Health & Safety Support Network WRC Staff Training – Los Angeles – January 2019

Preparations

- Understand the worker complaints
- Understand the work operations, as much as is possible
- Be familiar with the national laws
- Be familiar with the international and consensus standards
- Be familiar with factory/owner history

Laws and Standards

- National: OELs, regulations
- International: ILO conventions, recommendations, codes of practice, and guidelines
- Consensus: NFPA (fire and building); ASHRAE (temp); AIHA (ventilation); ANSI (equipment); NEC/EC (electrical); ACGIH (TLVs); industry OELs

- "Know who you are talking to" gender, age, social status, time constraints
- Be aware of literacy issues
- <u>How</u> as well as <u>what</u> you say
 - Inviting, non-threatening, respectful
 - "They are the experts"
 - Let them talk be a good listener "why"

- Start with open-ended questions, then follow specifics
- Follow the conversation thread to the end, then go to the next thread
- Be careful to use terms/words that they understand
- Do not over-react or be angry; do not interrupt or put words in others' mouths

- Encourage use of first person alternatively, ask about co-workers' experience
- Criticize practices or ideas, not people (who may be related or threatening)
- Ask about "non-routine tasks" and work on other shifts

- Health complaints:
 - Duration of symptoms
 - Resolution at night, over weekend
 - Return with return to work
 - Worse at end of week
- Identify patterns of common symptoms, exposures, work activities

- Look for underlying causes
- Identify workers' top 3-5 concerns and workers' ideas for possible controls
- Summarize key points at end of interview and get confirmation

- Generate written records of info:
 - Worker surveys of exposures, adverse health effect
 - Body maps
 - Hazard maps
 - Workflow maps
 - Create your own informal "JHAs" of assigned tasks

Questions?

See resource materials for examples

- Review information (as available):
 - Worker complaints
 - Log of worker injuries and illnesses
 - Written health and safety plan(s)
 - H&S policies and procedures
 - Formal JHAs
 - Records of periodic inspections by factory management

- Review available information:
 - Incident investigation reports
 - Chemical inventory lists
 - Equipment manuals and instructions
 - Maintenance records
 - Industrial hygiene monitoring records
 - Medical surveillance and testing records

- Review available information:
 - H&S grievances filed by union, or by workers to government agencies
 - Previous audits: government, brands, CSR monitors, industry associations

- Gather equipment
 - Paper and pen
 - Camera
 - Tape measure
 - Flash light
 - Test instruments (sound, temperature/ relative humidity, light, dust)
 - Electrical testers: "current pen" and circuit wiring testers

Gather inspector PPE

- Safety glasses (with side shields)
- Hearing protection (with cord)
- Disposable latex gloves (have available)
- Steel-toed shoes (as needed)
- Traffic vest (as needed)
- Cap/head wear for sun (have available)
- Water bottle

Prepare written aids

- Factory floor plan (e.g., evacuation plan)
- Checklists: both hazard specific and general OHS
- Interview outline managers, supervisors, and workers

- List of identified "hot spots" to observe
- List of any "non-routine" tasks to observe; other shifts' exposure to ask about
- List of people to interview

 Workers, supervisors, managers, H&S coordinator, maintenance department, medical clinic, HR department

- Follow the work flow in production
 - What's there at the start, what happens to it, what goes out the door
- Identify hazards created by:
 - Equipment and machinery
 - Raw materials and additives
 - Work process itself
 - Actual work practices (variance from policies)
- Identify differences in work performed by different shifts, on different days

- Inspect special departments:
 - shipping/receiving
 - raw materials and product warehouses
 - maintenance department
 - medical clinic staff and records
 - H&S staff and records

Conduct interviews

- Workers: just what they do, when and how it is done
- Supervisors: biggest "challenges" for H&S
- Managers: biggest "challenges" and "successes" in H&S
- "Business Case for H&S" pitch with management

On-site inspections

Generate documentation

- Walk-around notes
- Photographs
- Measurements
- Equipment identifiers (make, model, S/N)
- Interview notes

On-site inspections

- Meet as a group after inspection to compare notes
- Number each identified hazard for corrective action
- Demand proof of completed corrective action (photo, revised H&S programs, training materials, etc.)

Questions?

Many, many resources available

Contact Information

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