

Getting the Best Out of Collateral-Duty Safety Representatives in the Public Sector

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Introduction

Many public organizations use collateral-duty safety representatives. The author's experience is that many of these representatives are not properly selected, trained, or supported (Fanning 2003). This is caused by management's failure to make a conscious decision to use collateral personnel, no process to identify and assign the right person, no training plan, and little or no communication with the employee. The decision to use collateral-duty safety representatives appears to be made based on cost savings. However, the decision to use them alone or to supplement a full-time staff should be based on the best way to conduct a safety program and not just on costs. The decision should certainly include costs, as well as professional standards and return on investment. This paper will look at the best way to select, train, and use collateral-duty safety representatives to get the most return on investment for a public sector organization.

Organizational Responsibilities

The Occupational Safety and Health Act (OSH Act) of 1970 puts most of the onus to prevent needless accidents and injuries in the workplace on the employer. Section 5 (a) (1) states that "each employer shall furnish to each employee employment and a place of employment which are free from recognized hazards that are causing or are likely to cause death or serious physical harm to his employees" (OSH Act 1970). The OSH Act does not apply to public sector employers in the same way it applies to private sector employers, however, section 19 of the states that federal agency heads will implement a safety and health program within their organization. Additional guidance is provided in 29 Code of Federal Regulation Part 1960, Basic Program Elements for Federal Employee Occupational Safety and Health Programs and Related Matters. This serves as a handbook for federal organizations to use in developing and implementing a program. Lastly there is Presidential Executive Order 12196 of February 26, 1980, titled: Occupational Safety and Health Programs for Federal Employees. This order directs the heads of federal agencies of the executive branch to develop and maintain a health and safety program. The OSH Act does not apply to state or municipal governments. However, nearly every state has its own standards covering public employees. These standards are in the form of state laws, regulations, and orders and the content and requirements may differ from state to state.

This means that even though public sector organizations are not held to the same standards and rules as private organizations they are directed to put programs in place to prevent accidents by recognizing and eliminating hazards in the workplace. How these public sector safety programs are staffed is the next logical step in determining how to prevent needless injuries and illnesses.

The Use of Collateral-duty Personnel

Through the author's discussions concerning the use of collateral or additional-duty safety personnel many pros and cons were heard. Safety professionals want to maintain the high level of services that are provided by a full-time professional and many feel that a collateral person would perform the duties to a lesser standard. Managers expressed a concern for controlling the cost of preventing accidents, which includes the labor costs of the safety staff. Others believe that a behavior approach must involve only employees and management and not a middle person. Still another opinion, often heard, is that adding this duty to an already hard working employee may be unfair and may lead to a safety program that is ill fated (Fanning 1998).

The decision to use collateral safety personnel alone or to supplement a full-time staff should not start with concern for expense, professional standards, or employee workload. The decision should be based on which method enables the organization to conduct a safety program that reduces risk to their work force, customers, and local community from the work processes, products and services they produce. The decision certainly should include cost, professional standards, and return on investment. Public opinion surveys and discussions conducted by the author identified that it is management that decides whether to use full-time or collateral-duty safety personnel based on the needs of the organization (Fanning 1998).

In today's environment of public organization downsizing and outsourcing, many managers may feel driven to cut costs by using collateral-duty safety representatives. This may mean that even full-time staff might be cut and replaced with collateral-duty staff. This makes implementing a logical process to select, train, and support collateral-duty safety representative all the more important (Fanning 2005).

Resources

The public manager and his or her human resource manager must identify resource needs and justify them in the budget processes. This will include the resources needed to staff the safety program. The following ratios will aid in the budget decision making process and are based on the author's experience. Collateral-duty safety representatives should be used at a ratio of one collateral safety representative for every five hundred employees. This assumes that the representative is allowed to spend 8 hours a week on safety duties. When an organization has employees working three shifts, the collateral-duty safety representative ratio should be one per shift instead of based on number of employees. Full-time safety personnel should be used at the ratio of one for every 3, 500 employees. If a mixture of collateral and full-time safety personnel are used the ratio should be a full-time safety person at the headquarters level with collateral-duty safety representatives assigned at a ratio of one for every 1,000 employees.

The safety budget must also include the salaries of the collateral and/or full-time safety personnel. The time the collateral-duty safety representative spends on safety is time they are not doing their

primary job of production or service. This cost should be equal to or less than the amount management budgeted. This cost is often overlooked.

In addition to the salaries, management should budget \$0.24 per employee per month. This will be used to purchase promotional items, safety awards, standards, regulations, and awareness material. Awareness material includes posters, flyers, stickers, pins, and banners for specific hazards in the workplace.

Selection

Before management makes the decision to use collateral-duty safety representatives, the first step is for management to know the duties that this person will perform. Table 1 presents an excerpt of traditional duties for a safety person based on a pamphlet by the American Society of Safety Engineers (ASSE) (ASSE 1996). The next step is to determine if those duties can be done adequately by a collateral-duty or full-time safety person considering costs, complexity, professional standards, and return on investment.

If management decides that a collateral-duty person can fulfill the duties adequately, management must decide to either to use collateral-duty safety representatives alone or to support a full-time staff spread throughout the organization, focused on providing services to their section. If the second duty assigned to the collateral-duty safety representative is related to safety such as engineering, environmental protection, facility management, or nursing, the duties complement each other.

Once management decides to use collateral-duty safety representatives and in what capacity they will be used, the right person must be selected to fill the position. Ideally, management is looking for someone who has done these duties before as either a collateral-duty or full-time position. In reality management will find individuals who have some knowledge, skills, and abilities that are similar and with which the individual could learn to do the duties properly.

There are a number of books on the market that can help managers. One source is the Career Guide to the Safety Professional published jointly by the Board of Certified Safety Professionals (BCSP) and the American Society of Safety Engineers. This book outlines the knowledge areas needed by a safety person on pages 3-4 (BCSP and ASSE 2000) (see Table 2). If possible, management should select a person with the knowledge areas outlined in Table 2. The key is to get a person with as much knowledge, skills, and abilities as one can. Once this is done, management must identify the gaps in skill areas and the individual trained to fill those skill gaps.

When collateral-duty representatives are appointed they are seldom told what their new duties are, how much time they can spend on those duties, or how their performance will be rated. An example of an amendment to a position description is at Table 3. The individual that is selected should have their full-time position description amended to include the safety duties. Once this is done a meeting should occur that includes the employee, their supervisor, and the official in the organization responsible for safety. At this meeting, the amendment to the position description, the number of hours each week the employee is allowed to perform safety duties, and how the employee's performance in this collateral-duty will be rated will all be discussed.

Once this information is agreed to the next step will be to identify the skill gaps the safety representative has and how best to fill those gaps. The gaps are determined by comparing the duties of the position in Table 1 and the knowledge areas in Table 2 with the knowledge, skills, and abilities

of the newly appointed employee. Where there is knowledge, skill, or ability missing the employee must be trained.

Training

Management must provide training that the collateral-duty safety representative needs or the employee will not have a fair chance of performing the duties successfully. This will frustrate the employee and damage the safety program. Training courses are provided through local colleges, public and private associations, the Occupational Safety and Health Administration (OSHA), OSHA approved regional training centers, and private companies. Each knowledge area in Table 2 can be learned in a 1 to 5 day course. Several may be learned simultaneously in a single course (Fanning 2003).

In addition, to in-resident (employee attends training in a classroom) training, many organizations offer non-resident (employee attends training at work, home, etc.) training that includes video cassette- computer based training and correspondence courses. The author does not recommend using non-resident delivery methods for all training, but they are useful. These non-resident delivery methods can easily supplement resident training at a ratio 80 percent non-resident to 20 percent resident.

At Table 4 is an excerpt from the OSHA course catalog that one can access on the World Wide Web at <http://www.osha.gov/web/dcsp/ote/coursecatalog/default.asp>. Table 4 serves as an outline of the courses that exist to prepare a training plan for the collateral-duty safety representative. This catalog may also be used to identify training classes for other employees of the organization.

Support

After the individual is selected and trained management must support them. Ray Boylston says that “managing safety and health programs is one of management’s most important responsibilities” (Boylston 1990). First the manager meets with the collateral-duty safety representative and his or her supervisor. The manager shares his or her vision of where the safety program should go and the reporting chain for safety issues.

Management must give the collateral-duty safety representative access to senior managers. The senior manager must sign a policy memorandum and make sure that other managers and supervisors buy in to the program. Ray Boylston also says that “the ranking manager must set the proper example by his or her actions and must demand a similar commitment from the entire line organization” (Boylston 1990). If the program belongs only to the collateral-duty safety representative it is doomed to fail. They cannot do it on their own; management must do their part.

Serving as a collateral-duty safety representative should be viewed as training for higher level duties in the future, experience in project or program management, potential to move into safety as a full-time position, and as continuing to grow as a person and employee. If this approach is taken employees will want to perform these duties even if they are in addition to their full-time job.

Conclusion

Many public organizations use collateral-duty safety representatives. With today’s fiscal realities

many public organizations may need to cut full-time personnel and use collateral-duty representatives. No matter the reason for deciding to use collateral-duty personnel management should implement a logical process to select, train, and support the person they have appointed. This paper looked at the best ways to select, train, and support collateral safety representatives. If these three areas are given proper attention the safety program within a public organization can prevent needless accidents and the cost associated with them.

- Serve as management’s representative on all aspects of safety.**
- Interpret safety policies and procedures.**
- Provide information to line organizations.**
- Conduct periodic surveys, inspections, and follow-up hazard abatement.**
- Maintain records of surveys and inspections.**
- Assist supervisors in investigating accidents.**
- Follow up with management on serious reports of injury, illness, and property damage.**
- Maintain the OSHA log.**
- Create the annual OSHA summary.**

Table 1. A list of the major duties of the collateral-duty Safety representative is outlined in the brochure Scope and Functions of the Professional Safety Position.

| | | | | |
|-------------------|-------------------|----------------------------|-------------------|--------------------|
| Chemistry | Biology | Physics | Ergonomics | Economics |
| Psychology | Physiology | Biomechanics | Medicine | Engineering |
| Sociology | Geology | Business Management | | |

Table 2. There are a number of common knowledge areas identified in the Career Guide to the Safety Profession.

Position Description Amendment - Collateral-duty Safety Representative

As a Collateral-duty Safety Representative (CDSR) the employee will serve as the director's representative on all aspects of safety. They will interpret safety policies and procedures for the director, line managers, and supervisors. An agreement will be made upon assignment of this duty about the number of hours the employee can use to perform these duties, the reporting chain for this additional duty, and how the employee's performance of these duties will be recorded. The employee must attend and successfully complete General Industry Course-32 hours to perform these duties.

The employee will conduct a baseline survey every five years and routine inspections annually. In addition, they will follow-up, within 90 days of inspection, to verify hazards have been abated. They will maintain records of surveys and inspections.

The employee will follow up with the director on major accidental injuries and property damage immediately. The employee will investigate major accidents and assist supervisors in investigating minor accidents. A major accident is defined by loss of life, permanent or partial disability, or property damage that causes the loss of an entire system. The employee will review, for completeness and accuracy, accident reports by supervisors. Accidents are reported on the Occupational Safety and Health Administration (OSHA) form 301. The employee will prepare an OSHA Log of recordable accident reports correctly and on time using the OSHA form 300. At the end of each calendar year the employee will transfer the totals of injuries and illnesses from the OSHA form 300 onto an OSHA Form 300A. The employee will collate accident, injury, and property damage reports quarterly into a written report that identifies trends and seasonal hazards. The employee will provide this information to line organizations.

The employee will coordinate safety training or recommend on-line safety courses to supervisors.

Table 3. Documenting the duties makes it easier for the employee to perform them.

| Course Number | Course Title |
|----------------------|---|
| 510 | Occupational Safety and Health Standards for the Construction Industry |
| 511 | Occupational Safety and Health Standards for General Industry |
| 1020 | Basic Accident Investigation |
| 1050 | Introduction to Safety Standards for Safety Officers |
| 1410 | Inspection Techniques and Legal Aspects |
| 2000 | Construction Standards |
| 2010 | Hazardous Materials |
| 2040 | Machinery and Machine Guarding Standards |
| 2070 | Fire Protection and Life Safety |
| 2080 | Cranes and Materials Handling for General Industry |
| 2200 | Industrial Noise |
| 6000 | Collateral-duty Course for Other Federal Agencies |
| 6010 | Occupational Safety and Health Course for Other Federal Agencies |

Table 4. There are some common courses that every collateral-duty safety representative should take.

Bibliography

Boylston, Ray, Managing Safety and Health Programs, Van Nostrand and Reinhold, 1990.

Career Guide to the Safety Profession, Board of Certified Safety Professionals and the American Society of Safety Engineers, 2000.

Executive Order 12196 of February 26, 1980, Occupational Safety and Health Programs for Federal Employees. Retrieved from World Wide Web 22 February 2006 at <http://safetynet.smis.doi.gov/ExeOrder.htm>.

Fanning, Fred, Basic Safety Administration: A Handbook for the New Safety Specialist, American Society of Safety Engineers, 1998 and 2003.

Fanning, Fred, "Using Collateral-duty Safety Representatives in Your Safety Program." Perspectives, Fall 2005, Volume 5 Number 1.

29 Code of Federal Regulation Part 1960, Basic Program Elements for Federal Employee Occupational Safety and Health Programs and Related Matters Retrieved from the World Wide Web 22 February 2006 at <http://www.washingtonwatchdog.org/documents/cfr/title29/part1960.html>.

Occupational Safety and Health Act, Public Law 91-596, U.S. Government Printing Office 1970.

Scope and Functions of the Professional Safety Position, American Society of Safety Engineers, 1996, Form SF-10/M-M-2/96.

OSHA Training Institute Course Catalog web site. Retrieved from World Wide Web 17 February 2006 at <http://www.osha.gov/web/dcsp/ote/coursecatalog/default.asp>.