



An Initiative of the
American Staffing Association
and National Safety Council

Client Safety Performance Evaluation Best Practices

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Client Safety Performance Evaluation Best Practices

Perhaps the most critical of all staffing firm practices that protect temporary workers is the evaluation of client safety performance, including an assessment of risks and controls at a client work site. OSHA's Temporary Worker Initiative states, "Prior to accepting a new host employer as a client, or a new project from a current client host employer, the staffing agency and the host employer should jointly review all work sites to which the worker might foreseeably be sent, the task assignments and job hazard analyses in order to identify and eliminate potential safety and health hazards and identify necessary training and protections for each worker." (OSHA Bulletin No.1 [Protecting Temporary Workers](#)).

There are a number of factors staffing firms should consider in the evaluation of client work site safety:

- **Timing of evaluation**—preferably prior to workers commencing work, after which material changes to client operations may occur, and on a periodic schedule thereafter
- **Skill level of evaluator**—someone capable of identifying and assessing risks
- **Accountability and oversight of evaluations conducted**—a trained environmental, health, and safety (EHS) professional who owns the work site evaluation process, data collection form, and quality of data collected, and has approval/denial authority for business decisions based on client safety performance
- **Evaluation form**—comprehensiveness of risks assessed, ease of use¹, cultural factors assessed, roles and responsibilities clarified, training offered, and safety performance data captured

Timing of Evaluations

As OSHA notes, these evaluations should ideally happen "prior to accepting a new host employer as a client, or a new project from a current client." Since these evaluations are a snapshot in time, it is also a best practice for staffing firms to determine what has changed at the client site since the initial evaluation was conducted. Clients can add or move machinery, design new workflows or product lines, add equipment, add new or substitute current chemicals, bring on other outside labor, add shifts, and make other changes that introduce new risks. Staffing firms should set a goal for frequency of follow-up evaluations—including asking the questions about what's changed and periodic full re-evaluations.

Skill Level of Evaluator

Evaluators should be trained in hazard identification, evaluation, and control. The evaluation will only be as good as the evaluator's ability to capture sufficient information to allow an informed business decision to be made. The evaluation form itself can do a lot to guide the process, but there is still a lot of knowledge the evaluator must have in order to accurately pinpoint hazards the temporary worker will be exposed to and determine whether the client adequately controls for such hazards.

¹ How easy it is for the evaluator to fill out when on site at the client's location. The form should be well designed and organized, and the meaning of all questions should be clear.



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Because some level of initial and ongoing training will likely be necessary for evaluators (unless the staffing firm has the luxury of having enough safety professionals to do these assessments), it is a good idea to invest in a select number of staff who become capable of evaluating the host employer work site. Training should be done by a professional who has a safety, engineering, or other degree, as well as certifications. These individuals can be hired as independent consultants, or you might find them through your workers' compensation carrier or the National Safety Council.

OSHA's Temporary Worker Initiative states, "Staffing agencies need not become experts on specific workplace hazards, but should determine what conditions exist at the work site, what hazards may be encountered, and how to best ensure protection for the temporary workers. Staffing agencies, particularly those without dedicated safety and health professionals on staff, should consider utilizing a third-party safety and health consultant." (OSHA Bulletin No.1 [Protecting Temporary Workers](#)).

In order to gauge the skill level of evaluators, it is a best practice to put in place multiple checks of their level of competency. For example, once initial training has taken place, there could be a series of co-visits the trainee makes with the staff safety professional or hired consultant. Once those co-visits have taken place and the trainee is approved, the staffing firm could offer a test or require a certificate to be earned through a third party (for instance, OSHA 10, or the NSC "Principles of Occupational Safety and Health"). Then, of course, the staffing firm should require a certain level of ongoing training be completed by evaluators so their learning continues.

Accountability and Oversight

Staffing firms should assign ownership of and accountability for the entire work site evaluation process, data collection form, and quality of data collected to a single individual—ideally one who is a trained, credentialed safety and health professional. The step of evaluating client safety performance will only be effective if it is managed by someone trained to identify, assess, and evaluate effective control of risk. This means that the responsible individual will oversee the training and education of those conducting evaluations, development and continued enhancement of the form used by evaluators, the quality of the data collected, and the effectiveness of the evaluations in making favorable business decisions.

In conjunction with this safety professional, the staffing firm may consider identifying workers' compensation class codes (NCCI) that are deemed "high hazard," or specific work tasks or situations that are to be prohibited or require special approvals. This sets some guidelines up front for those in a business development function to be able to steer clear of clients or orders that are likely to be "expensive" or lead to poor returns on investment from a workers' compensation cost standpoint or follow the proper decision-making channels when evaluating a prospective client. Identifying these work tasks or situations up front allows higher risk activities and jobs to be flagged and pricing adjusted (or business decisions made) accordingly. Likewise, to be sure liability risks are mitigated, staffing firms should consider identifying jobs or work assignments requiring criminal background checks.



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Staffing firms should use a standard form for client work site evaluations that helps differentiate levels of safety among various clients and work sites. The evaluation form itself should be comprehensive and adequately capture all pertinent information to make a business decision about whether to place workers at a client, location, and/or department. Some staffing firms have found it helpful to create the form in such a way that it leads to a client safety “score.”

Scores, whether numeric or alphabetic, can help differentiate levels of safety among various clients and work sites. These scores, in turn, can be compared—even correlated—to actual client safety incidents involving temporary workers. Over time, staffing firms should be able to demonstrate that higher client safety evaluation scores are associated with “better” incident rates and, similarly, that lower client safety evaluation scores are associated with “poorer” incident rates. When this is not the case, it signals that some changes might be needed to the client safety evaluation process (timing or skill of evaluator), form, or both. It may also signal that it is time to have a more frank discussion with the client about its safety management efforts or to terminate the partnership altogether.

The outcome of the client work site evaluation should be the effective identification, review, and documentation of potential safety and health hazards, safety program gaps, and safety performance issues that are affecting client safety performance and that could compromise temporary worker safety. If the decision is made to place workers, such issues must be communicated to the client, such communication documented, and client mitigation of noted hazards monitored and documented by the staffing firm.

Evaluation Form

The client safety evaluation form can serve many purposes. If you think about this form’s purpose—to capture enough information to determine whether your workers would be safe there—many factors become relevant:

- Client’s historical safety performance (including whether temporary workers’ injuries have been recorded in the OSHA 300 log)
- Client’s current safety and health programs (and whether your workers will be included in them)
- Risks inherent in the proposed work assignment
 - Physical work environment
 - Machinery, tools, equipment, and motorized vehicles
 - Work activities, tasks, situations
- Client’s commitment to training your workers
- Client’s commitment to providing and maintaining personal protective equipment (PPE), if required
- Client’s cultural factors
 - Management commitment to safety
 - Worker involvement in safety



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Historical Safety Performance

Staffing firms may request and collect data on a client's historical safety performance at the business development phase to rule out poor performers up front before staff expends too much energy pursuing a partnership with a client that has unsatisfactory business indicators such as financials, safety performance, or one-sided terms and conditions. However, these data often do not reside with other safety evaluation data, making it difficult for business decision-makers at the local branch level to see the whole client safety picture. Ideally, the evaluation form would house all pertinent client safety data, regardless of who provides or collects it.

Another consideration is whether historical safety performance data should be collected for all clients versus only those for which high-hazard jobs would be placed, within specific industries, from clients on OSHA's Severe Violator Enforcement Program (SVEP) list or with OSHA citations, or those with known or rumored safety problems. It is a best practice to collect historical safety performance data from *all* clients.

Client data that staffing firms should consider collecting and analyzing:

- Federal employer ID number
- WC classification code
- Experience modification rate (EMR) (most current)
- OSHA 300 logs for the past three to five years
- Incident rates (total recordable case [TRC] rates; days away, restricted, transferred [DART] rates; etc.)
- NAICS (industry) code (to compare client incident rates to U.S. Bureau of Labor Statistics industry benchmark rates)
- OSHA citations and penalties for the past five years; presence on SVEP list (available at osha.gov for previous citations)
- Completed hazard abatement for any existing OSHA citations or penalties
- Number of severe injuries to *ANY worker² under supervision³*, resulting in hospitalization, amputation, or loss of an eye, from the past five years
- Number of fatalities to *ANY worker under supervision⁴* for the past five years
- What direction client's overall safety performance is going (improving, worsening, plateauing²)

Client Safety and Health Programs

Clients will often have a documented health and safety program, as it is a requirement in many states, though clients may not have thought specifically about how they will involve temporary

² All workers—permanent or temporary. Example: Independent contractors that might be on site doing maintenance tasks or other work that is not being directly overseen by a client supervisor (they may have their own supervisor or be working solo).

³ "Under supervision"—to ensure that the client includes temporary workers suffering an injury if they were, in fact, supervising their work. Example: In the case of an independent contractor doing unsupervised work on site, if the contractor is injured, the client is not required to put that on its OSHA 300 log. It's a best practice for the client to keep that data somewhere for improvement purposes.

⁴ Same.



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workers or whether they will involve them at all. It is worth having these discussions with the client as you are collecting information and performing the on-site risk assessment.

Specifically, the evaluation form should contain a place to note that the staffing firm representative performing the evaluation asked the client whether training and PPE provided to the client's employees would also be provided to temporary workers performing the same task. For follow-up evaluations that are performed periodically, the form should contain a place to note whether training had, in fact, been provided, and the staffing firm representative should ask to see documentation of such training.

Specific programs a staffing firm may want to inquire about or ask to see related documentation for include these.

Programs most employers should have:

- CA—Injury and Illness Prevention Program; WA—Accident Prevention Program; Others—written safety program
- Written safety policy
- Written safety rules
- Emergency procedures, evacuation plan, shelter in place plan, active shooter plan
- Ergonomics programs
- Housekeeping
- Contract and temporary worker policy or contractor management program
- Compliance policies for mandatory occupational safety programs (or a list of what is required for compliance)
- Stop work authority of workers
- Driving safety
- Injury/illness reporting
- Antiretaliation/whistleblower protection policy
- Incident investigation
- Return to work program
- Wellness program
- Disciplinary policy for safety violations

Programs based on operational risks present:

- PPE programs
- Spill containment and cleaning protocols
- Job rotation, shift work schedules, overtime records
- Lockout/tagout
- Confined space entry
- Machine safeguarding
- Industrial hygiene (noise abatement, hearing conservation, air quality, respirator)
- Bloodborne pathogens (Hepatitis B program, vaccinations, sharps handling)



- Hazard communication
- Powered industrial trucks (PIT) program

The evaluation form should have a place to capture the programs in place at the client site.

Risks Inherent in the Job

While historical safety performance and the documentation of existing programs is important, it does not tell the whole story. Programs can look good on paper, but it is the work site itself and how well the job's risks are controlled that will dictate whether a worker should be placed at the client.

The evaluation form should be capable of capturing not only the risks present for the job where a worker is to be placed, but also whether the controls observed mitigate or eliminate the risk. The identification of potential risks and effective controls takes a tremendous amount of education on the part of the assessor. Knowing that many staffing firms have people who are not safety professionals conducting these evaluations, there are three ways to ensure a thorough and effective evaluation takes place for every client:

- Have a safety professional oversee and review every client work site evaluation
- Provide ample ongoing training and development for those conducting evaluations (and limit the number of staff who do it)
- Create the form in such a way that it explains what effective controls should be in place for specific, frequently encountered risks (or have this information available in some other form that is readily available to the evaluator)

This is a guide for what categories a work site evaluation form should contain. Depending on the work site and jobs being filled, not all categories will need to be assessed. The job description for the position in which the worker is to be placed should serve as a guide to which categories will be most germane to the risk assessment.

General

- Supervision—how often, who
- Shift work, scheduling
- Asbestos, lead, silica exposure
- Combustible dust, debris, scrap, waste
- Needles or other sharp objects
- Exposure to chemicals (note which ones)
- Physical nature of work (note lift/carry, push/pull, climb, crawl, squat, kneel, bend at waist or neck, balance, twist at waist or neck, reach above shoulder level)
- Repetitive work (note what it is and what body part or parts are affected)

First, the evaluator should identify what tasks or activities the temporary worker will be performing. Here is a partial list of possible tasks or activities:



Tasks, Activities, Work Situations:

- Work at heights or on elevated surfaces (higher than 4 feet, including ladders, scaffolding, roofs, scissor lift, platforms)—note which ones
- Work below grade (lower than 3 feet)
- Work in a confined space
- Lifting or carrying (note average and maximum weight, rate per hour, height being lifted, etc.)—see NIOSH Lifting Equation for more information
- Assembly, sorting, packing
- Dock work
- Loading/unloading trucks
- Data entry
- Cleaning
- Driving
- Transporting employees and materials
- Electrical work (including work on energized equipment)
- Maintenance, cleaning, or setup of machinery/tools
- Work on pressurized equipment/lines
- Changing forklift batteries or propane tanks
- Fueling
- Securing cargo
- Inflating tires
- Rigging
- Digging, trenching, excavation
- Sandblasting
- Use of explosives (including fireworks)
- Flagging/signaling
- Cement/asphalt work (flat work, tilt-up work, form work, precast, etc.)
- Oil, natural gas, or nuclear power operations or facilities
- Direct patient or personal care
- Working directly with children
- Work near water
- Operation of construction, farm, or logging equipment
- Security guard assignments
- Animal care

Physical Work Environment (note conditions):

- General work environment
- Exits marked and clear of obstacles
- Stairways clear
- Evacuation maps posted in multiple areas
- First aid stations/kits, body/eyewash stations stocked and operational
- Fire extinguishers accessible and tested



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- Emergency phone numbers posted, including fire, rescue, police
- Emergency response procedures are in place by host employer
- Availability of Safety Data Sheets and means for periodic updating
- Noise louder than 85 dB requires hearing protection
- Sanitary eating area located away from production
- Lighting
- Ventilation
- Combustible dust prevented from going into suspension (vacuum system)
- Combustible scrap, debris, waste stored safely
- Temperature extremes
- Housekeeping
- Oily and paint-soaked waste disposed of in covered metal waste cans
- Uneven walking surfaces painted, lit, or covered
- Elevated platforms higher than 30 inches have guardrails
- Overall facility conditions

Machinery, Tools and Equipment, Motorized Vehicles (will worker use or perform):

- Ladders (note type to be used)
- Powered industrial trucks (forklift, reach truck, scissor lift, aerial lift, order picker, riding mower, etc.)
- Heavy machinery (cranes, bulldozer, scraper, haul truck, dump truck, excavator, grader, etc.)
- Cement/asphalt machinery (pavers, screed rollers, transit mixers, etc.)
- If driving, what vehicle (tractor-trailer, flatbed, cargo, pickup truck, sedan, etc.)
- Hand tools (utility knife, hammer, wrench, screwdriver, pliers, etc.)
- Power tools (hand grinder, circular saw, drill, nail gun, abrasive wheel, chop saw, etc.)
- Machinery (computer numerical control machine, lathe, milling, forge, extruder, brake press, planer, power press, band saw, roll former, etc.)
- Air compressor tools (jackhammer, pressure washer, etc.)
- Welding (oxyacetylene, arc/stick/SMAW, mig/tig, plasma, friction)
- Painting (electrostatic, powder coating, spray gun, spray booth, spray can)
- Operational (overhead crane, conveyor, robotics, dip tanks, electroplating)
- Clerical (computer, 10-key, copy machine, paper shear, auto folder, auto letter opener, blueprint machine, express mail tabber, etc.)
- Manual material handling aids (carts, dollies, conveyors)
- PPE required (note which ones, who pays for it, and whether client trains on proper use/maintenance/storage):
 - Head
 - Eyes/face
 - Clothing
 - Hands
 - Feet
 - Hearing
 - Respiratory



Client's Cultural Factors

How a client manages risk is an obvious indicator of safety performance. Two not-so-obvious indicators involve management's commitment to and leadership in safety, and the extent to which the client involves its workforce in safety efforts. Companies with great safety performance often involve all levels of staff in safety; it is not just the safety person's responsibility in those businesses.

Some clues that a client's management is committed to safety:

- Communication of safety and health policies and written safety programs to all employees, including temporary and contract workers
- Inclusion of temporary worker reported injuries/illnesses in the overall safety performance measurement system
- Responsiveness to staffing firm requests/recommendations stemming from its evaluation of client safety
- Having a full-time safety manager
- Providing ongoing safety training for temporary workers
- Making safety a key indicator of organizational excellence

Some evidence that the client engages workers:

- Policy or statement identifying worker involvement as a vital element in success of safety program, inclusive of temporary and contract workers
- Policy or other documents identifying client site-specific worker involvement methods used in its safety management system, such as individual development and training, individual involvement and influence, participating in employee safety training, safety meetings, safety committees or teams
- Feedback mechanisms from workers to management to communicate hazardous conditions (near-miss reporting, etc.) or express ideas for improvement (suggestion box, safety committee, etc.)
- An expressed commitment to include temporary workers in the safety program in the same manner and extent as its own employees

Please refer to the "Client Safety Evaluation" template in the SSE portal, available exclusively for Safety Standard of Excellence participants. Compare the template with your own or use this one for improved evaluation of a client's safety performance and culture.