



An Initiative of the
American Staffing Association
and National Safety Council

Staffing Firm Safety Training for Temporary Workers: Best Practices and Recommended Training Content

Best Practices

Safety and Health Training

Temporary workers deserve the same protections under the Occupational Safety and Health Act of 1970 as all other covered workers. OSHA's Temporary Worker Initiative (TWI), launched in 2013, states that the staffing agency and host employer share responsibility for training temporary workers. Furthermore, "training must be completed before the worker begins work and must be in a language the worker understands. Depending on the industry, worksite, and job duties to which the temporary worker is assigned, certain OSHA standards which require both generic and specific training may be applicable. While both the host and staffing agency are responsible to ensure workers are properly trained according to the applicable standard, the employers may decide that a division of the responsibility may be appropriate. As a recommended practice, the staffing agency and host employer should establish which party is responsible for each aspect of training, as well as inform the other employer when training is completed. The details of the training to be performed can be clearly stated in the language of the contract or agreement between employers. However, neither employer may avoid their ultimate responsibilities under the OSH Act by requiring another party to perform them" ([TWI Bulletin No. 4 "Safety and Health Training"](#)).

It is the responsibility of both parties to review applicable OSHA standards, know the specific training requirements, and determine and agree upon the generic safety training requirements and site-specific training requirements each party will provide. Information on these requirements can be found on the [OSHA training website](#) and in OSHA's publication "[Training Requirements in OSHA Standards](#)".

The staffing agency is usually responsible for providing generic health and safety training, whereas the host employer will typically be responsible for site-specific hazard training. The goal of the generic health and safety training is to give workers the basic ability to identify hazardous situations, report hazards, injuries, and illnesses, and understand their rights if confronted with a hazardous situation at a worksite. The staffing agency is also responsible for ensuring workers receive proper site-specific training. There are two ways to achieve this:

- The staffing agency must have a reasonable basis for believing the host employer's training adequately addresses the potential hazards to which workers will be exposed at the host employer's worksite.
- Although not usually the case, the staffing agency may agree to provide site-specific training if it is familiar with the hazards of the worksite.

If the staffing agency does not believe the site-specific training offered by the host employer is adequate, it should inform the host employer and collaboratively determine and provide adequate training itself or refrain from placing its workers at the host employer's worksite.

Ongoing Training

During a worker's tenure with a staffing firm, periodic training and general safety information should be provided. Training is not a one-and-done at the beginning of an assignment. Such information should include:

- Results of worksite inspections for client sites to which workers are assigned (including pre-assignment inspections, periodic updates to original inspections, after a worksite incident, or after a



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significant change in client staff or temporary workers' duties). This is particularly important for workers on long-term assignments with specific clients.

- Post-incident training to review root causes and corrective actions (lessons learned) for all investigations during the prior time period and regardless of client assignment. By training all workers on what has happened in the past and what the appropriate corrective actions are, it serves as a reminder that safety incidents can happen and can raise general safety awareness among all assigned workers. Names of employees and clients should be removed from such training.

Training Methods and Sequencing

There are many methods for conveying important safety information and ongoing safety training. Repetition can be more effective in the long run versus an “information dump” when the worker first starts a new position. That said, certain training must take place prior to placement while others can be ongoing. Training and communication can be spread through:

- Electronic newsletters
- Email
- Safety posters at the staffing firm and client sites
- Regularly scheduled lunch room talks, teleconferences, or webinars
- Recordings, videos, virtual reality
- Paycheck stuffers
- Staffing firm website dedicated to workplace safety issues and information
- A print or online library of safety and training materials

A Word About Worker Engagement

When development and enhancement of safety training includes worker participation and input, workplace injury and illness prevention programs are improved. Workers can identify missing safety information, make recommendations for changes and help ensure their peers are prepared to work safely. In addition, when workers have a voice in how training is developed (including content, delivery method, timing, etc.), their buy-in and adoption of the training principles are increased. Therefore, consider ways to involve temporary workers in the development and enhancement of your current safety orientation training. This may even involve having temporary workers participate in conducting the training or being a part of the content itself (e.g., worker speaks to a safety topic in a video).



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Training Content

Below is a list of recommended orientation training topics:

- Staffing firm commitment to safety and health
 - Overview of management commitment to safety and health
 - Participation in the Safety Standard of Excellence® program
 - Employer safety responsibilities (General Duty Clause of OSH Act, Temporary Worker Initiative)
 - Occupational health and safety roles and responsibilities of the staffing firm, client, and worker
- Explanation and review of staffing firm safety and health programs/policies
 - Safety and health
 - Jobs workers are not allowed to perform (if applicable)
 - Drug-free workplace (drug and alcohol policy)
 - Discrimination and anti-harassment
 - Workplace violence prevention
 - Property damage
 - Retaliation
 - Reporting changes in job duties, equipment, or worksite/department that is different from original description
 - Reporting hazards
 - Incident reporting and investigation
 - Injury protocols
 - Return to work
- Worker's rights
 - OSHA right to safe and healthful workplace
 - Right to file a complaint (including chain of command/protocol for doing so)
 - Whistleblower protections
 - Right to refuse unsafe work
- Expectations of client (or supervising entity) to provide site-specific and job-specific training
 - Client site safety policies, rules, safe operating procedures
 - Hazards worker is likely to encounter; unique hazards or special challenges of the job itself; how to identify and safely correct hazards; boundaries of site access
 - If PPE is required, explanation of when PPE is necessary; what PPE is necessary; how to properly don, doff, adjust, and wear the PPE; limitations of the PPE; proper care, maintenance, useful life, and disposal of the PPE (see Appendix A)
 - How to report incidents, near misses, property damage
 - Emergency procedures (fire, evacuation, medical, chemical spill) including means of exit, rally points, and location of first-aid supplies, eyewash stations, fire extinguishers, and AEDs; location of emergency contact numbers, safety data sheets (SDSs), alarms, stop switches
 - Verification/evaluation process to ensure information provided during training is understood
- Common hazards and safe behaviors (use results from worksite assessment to guide training based on hazards identified during the walkthrough)
 - Chemicals (labeling, SDSs, training on proper handling and storage, PPE)



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- Bloodborne pathogens, other potentially infectious materials (OPIM), and sharps injury (specific hazards, vaccination, PPE, training on proper handling and disposal, what to do if exposure incident occurs)
- Powered industrial trucks (safely working around, using designated walkways, requirement for client-specific certification before use; staffing firm rules about driving)
- Ladders (pre-use inspection, proper set up, proper usage, right ladder for the job)
- Office ergonomics (ergonomic assessment, proper office set up, frequent breaks, exercises)
- Energized equipment (lock-out tag-out, obeying signs and signals)
- Power tools (training on proper use and storage)
- Hand tools (training on proper use and storage)
- Machine guarding (purpose of guards, importance of maintaining guards in place)
- Work zone safety (obeying signs and signals, flagger safety)
- Heat/cold stress, noise, vibration
- Working at heights (fall protection)
- Lifting safety and proper body mechanics
- Specific details of the assigned job
 - General working conditions at the client site
 - To whom the assigned worker will report at the client site
 - Scheduled hours of work
 - Job qualifications, including the need for special training or ability to work with particular machinery or equipment
 - Orientation materials, handbooks, safety policies, and other assignment-specific information provided by the client
 - Existence of a strike or work stoppage at the client site (if applicable)



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Appendix A

Personal Protective Equipment (PPE)

Both the host employer and the staffing agency are responsible for ensuring necessary PPE and associated training is provided. PPE may include items such as gloves; safety glasses and shoes; earplugs or muffs; hard hats; respirators; or coveralls, vests, and full body suits. The type of PPE required is normally determined by performing a hazard assessment. The host employer will usually have the primary responsibility for selecting, providing, and ensuring the use of adequate PPE because the host employer:

- is most familiar with the workplace hazards that the temporary workers will encounter;
- generally controls the workplace hazards and the worker's activities around, and interaction with, those hazards;
- is usually best situated to perform the hazard assessment required for determining if PPE is necessary and will likely have already done so for its permanent staff.

Staffing firms should ask to see any hazard assessments performed by the client and if not provided, be prepared to ask for one to be conducted by the client or conduct their own.

The staffing agency and host employer may agree to have the staffing agency supply some or all of the PPE and provide PPE training as long as the host employer ensures the PPE is appropriate for the worker's assigned tasks, and that it is provided at no cost to the worker. Such an agreement should be made during the pre-planning meeting(s) and detailed in writing. Whichever entity agrees to provide the PPE and/or training, each worker who is required to use PPE must receive training. This training must teach, at a minimum:

- When PPE is necessary
- What PPE is necessary
- How to properly don, doff, adjust, and wear the PPE
- Limitations of the PPE
- Proper care, maintenance, useful life, and disposal of the PPE

For additional information, refer to [TWI Bulletin No. 2 "Personal Protective Equipment"](#).