



INSPECTOR FIELD MANUAL

Version 04/2022

Inspection Policy

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1. Policy Statement:

The Occupational Safety and Health Agency (the OSH Agency) will use inspection, within a legal framework of duties, regulations, Standards, and Approved, Code of Practices and enforcement instruments, to obtain assurance that duty holders adequately manage and control health and safety risks from work activities and comply with relevant statutory provisions of the Occupational Safety and Health Act Chap. 88:08 (OSH Act). The purpose of this policy is to provide a common, consistent, transparent procedure to inspect duty holders' undertakings consistently and enable the OSH Agency as the regulatory agency for safety and health to fulfil its duties under the OSH Act.

2. Policy Objectives:

To provide a consistent and transparent procedure for Inspectors to assess and evaluate Industrial Establishments; in order to ensure duty holders compliance to the OSH Act.

This policy will serve to guide Safety and Health Inspectors in the conduct of inspections and is formulated in accordance with the OSH Act and the OSH Agency's Enforcement Policy, which establishes the general principles and approach for conducting inspections of workplaces.

The main objective is to ensure that the principles of enforcement, *Proportionality, Consistency, Targeting, Transparency and Accountability* are adhered to so that similar approaches to achieve similar ends are undertaken when dealing with duty holders.

It is the intention that Inspectors will use this guidance to conduct inspections of Industrial Establishments within their jurisdiction.

3. Scope:

This Policy applies to Inspectors of the OSH Agency.

4. Responsibilities:

It shall be the responsibility of Inspectors of the OSH Agency:

- To conduct inspections as prescribed in the Inspection Procedure.

- Follow the OSH Agency’s enforcement decision making procedure, when a requirement for taking enforcement action was identified.
- Ensure that performance standards outlined in the Inspection Procedure are met by Inspectors.

5. Procedural Focus

This policy shall be implemented in conjunction with the OSH Act and all other policies of the OSH Agency.

This policy will be reviewed every two years subject to any legislative and/or policy requirements.

Approved by the Occupational Safety and Health Authority on 27th July, 2022.



.....
Chairman
Occupational Safety and Health Authority

<p>Inspection Policy Reference Number: OSHA/IFM/POL/04/2022</p> <p><i>Effective Date:</i></p> <p><i>Revision Date:</i></p>



INSPECTOR FIELD MANUAL

INSPECTION PROCEDURE

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1.0 PURPOSE

To provide a consistent, transparent procedure to inspect duty holders' undertakings and enable the Occupational Safety and Health Agency (OSHA) as the regulatory Agency, to secure compliance with the Occupational Safety and Health Act Chap. 88:08 (OSH Act) consistently and transparently; and to promote improving standards of health and safety in industrial establishments.

Inspections involve examination of the workplace or items of equipment in order to identify hazards, determine if they are adequately controlled, identification and citation of breaches of the provisions of the OSH Act. This will often involve an assessment of the following:

- (i) Unsafe acts;
- (ii) Unsafe conditions; and
- (iii) Management control.

Effective inspections require judgment in the identification, evaluation, and documentation in accordance with the OSH Act and Regulations made there under. An inspector is expected to make enforcement decisions which may include a letter documenting the findings of the inspection, citing breaches of the OSH Act related to the findings of the inspection, the identification of required corrective action(s) and the issuance of enforcement notices and prosecution where applicable.

Targeting of industrial establishments for inspections must not be prejudiced by the Inspector. Industrial establishments that are targeted for inspections are based on specific criteria. The aim of this procedure is to ensure that there are standardized approaches to the inspection of industrial establishments which give effect to the guiding principles of *Proportionality, Consistency, Targeting, Transparency, and Accountability as stated in the Enforcement policy.*

2.0 SCOPE

This procedure covers inspection of industrial establishments by OSHA Inspectors including inspections associated with verifying permitting requirements. **Inspectors** are responsible for:

- Ensuring inspections are planned, carried out, and reported.

- Following the appropriate enforcement decision making procedure where they identify a requirement for enforcement action.
- Meeting performance standards documented in the procedure or discussing with line management to agree with revised performance standards when necessary.

3.0 TYPES OF INSPECTIONS

Inspections can either be programmed (planned) or non-programmed (unplanned as a result of a complaint and accident investigation or request for an inspection) as presented on the Inspection Procedure Flow Chart in Appendix 1. The procedure for non-programmed inspections is the same as programmed inspections.

3.1 Programmed Inspections

Programmed inspections are pro-active. These inspections will be conducted with the overall objective of highlighting non-compliance to the OSH Act. These inspections may target the entire facility, segments of the facility, systems, policies or procedures. Programmed inspections are categorised as:

- (i) Routine Inspections
- (ii) Re-Inspections
- (iii) Blitz Inspections

- Routine Inspections

Routine inspections are initiated in accordance with the OSHA's targeting system. They involve the assignment of a risk rating index upon its completion which will be used to determine the timing of the re-inspection of the industrial establishment. Routine Inspections may be for the entire industrial establishment or part thereof. Re-inspections will then follow to verify the implementation of remedial measures at these industrial establishments.

- Re-Inspections

Re-Inspections are conducted to determine the extent to which the industrial establishment has rectified the non-conformances found during the previous inspection. The re-inspection may involve the entire facility or specifically targeting the areas previously identified. The Re-inspection Procedure is outlined in Appendix II.

- Blitz Inspections

A “Blitz” is an unannounced inspection. These inspections are based on the following criteria: the findings of analyses of OSHA accident statistics.

(i) High risks rating,

(ii) High frequency of non-conformance and

(iii) Satisfying the OSHA’s criteria for designating the industrial establishment as being high profile.

The inspection is conducted to assess the most evident breaches and sometimes will focus on specific unsafe acts or unsafe conditions or management control.

3.2 Non-programmed Inspections

Non programmed inspections are reactive inspections that are initiated as a result of the occurrence of an accident, a complaint, refusal to work, or any event that was prejudicial to the safety or health of the public.

4.0 TARGETING

Targeting of Industrial establishments for programmed (planned) inspections will be determined by the Chief Inspector, Senior Inspectors and Safety and Health Inspectors II.

The criteria are as follows:

- **Inspections prioritised by the Chief Inspector**

The Chief Inspector may direct the targeting process in light of contemporary developments or specialized circumstances.

- **Inspections requested by Duty Holders**

The Agency will facilitate duty holders who request inspections in order to identify gaps in their compliance or to fulfil their legal obligations in accordance with Sections 57(1) and 59 (1) of the OSH Act.

- **Accident Statistics**

Where there is a comparatively high or increased frequency and/or severity of work place accidents the industrial establishment will be targeted.

- **Risk Profile**

A risk profile reveals the nature and level of the potential incidents or accidents faced by an organisation; the likelihood of adverse effects occurring; the consequences associated with each type of risk and the effectiveness of controls in place to manage these risks. In some instances, there are easily discernible safety risks whereas in other instances, there may be chronic health risks that are not easily assessed. Consideration must be given to these issues when targeting establishments for inspection.

- **Compliance History**

Industrial Establishments with a history of non-compliance will be given priority in targeting.

- **Re-Inspections:**

Industrial Establishments must be scheduled for re-inspections based on a risk rating index that was assigned to the establishment after its most recent inspection. The risk rating index will be derived in accordance with the OSHA's Risk Rating Policy and Procedure.

5.0 RESEARCHING AND PREPARING FOR AN INSPECTION

Inspections may vary considerably in scope and detail depending on the circumstances of each case. It is therefore important that Safety and Health Inspectors adequately prepare for each inspection. Due to the wide variety of industries and associated hazards likely to be encountered, pre-inspection preparation is essential in conducting a quality inspection.

It is required that the Inspector must peruse the OSHA's files and records of the industrial establishment for the following information:

- Location of the industrial establishment and the contact person;
- Number and category of workers;
- Nature of the work process and its final products and services;
- Raw materials and equipment used, or use of hazardous materials;

- Previous inspections, violations of the law and enforcement actions;
- The existence of a safety and health management system, if any;
- Employer's willingness to comply; and
- Cases of work place accidents, ill health and diseases.
- Complaints from workers against management, and the action taken to address complaints
- Existence of a trade union in the enterprise, and whether there is a collective agreement between the union and management
- Where no file or record exists, the Inspector shall undertake the necessary research required for inspection using available resources to become familiar with the nature of the operation and conditions that are likely to be encountered. In this regard inspectors are required to utilise resources such as the ILO Encyclopaedia, ILO Standards, the internet or other Industry standards and best practices.

6.0 ACQUISITION OF INFORMATION

The following are some of the information required prior to undertaking an inspection:

- Suitable and sufficient personal protective equipment (PPE)
- Relevant copies of previous inspection reports and other related documentation
- Copies of specialised inspection checklists
- Process flow diagrams and the factory floor plan where available
- Utilization of specialized equipment (Camera, monitoring equipment, measuring tape etc.)

The process flow diagrams and the factory floor plan may be used to determine the location of equipment, identifying storage areas (particularly for chemicals), examining internal traffic flows, and the general flow of raw materials and products.

7.0 VISITING INDUSTRIAL ESTABLISHMENTS

Inspectors are required to: -

- Discuss the planned inspection route before undertaking the inspection with their supervisors.
- Review where they are going and what they would be looking for.
- If the inspection is being carried out by a team of inspectors, convene a team meeting to discuss and clarify key aspects of the inspection plan and approach, especially before going into noisy

areas. This eliminates the need for arm waving, shouting and other unsatisfactory methods of communication.

- To wear suitable and sufficient Personal Protective Equipment (PPE) where required. If an Inspector does not have PPE and cannot secure any prior to arrival on site, they should not enter the industrial establishment.

Generally, inspections will be unannounced. However, there are instances inspections are announced for the following reasons:

- Cases of apparent imminent danger to enable the employer to correct the danger as quickly as possible
- Cases where multiple documents are required to be reviewed
- Where the inspections can most effectively be conducted after regular business hours or when special preparations are necessary
- Cases when the presence of employer and worker representatives or other appropriate personnel are needed to aid in the inspection
- Cases when giving advance notice would enhance the probability of an effective and thorough inspection, e.g. in complex fatality investigations and cases of high public interest.

8.0 ON SITE

The onsite procedure is as follows:

- (i) Preliminary contacts and formalities
- (ii) Opening meeting
- (iii) Document review
- (iv) Walk through inspection
- (v) Closing meeting

9.0 PRELIMINARY CONTACTS AND FORMALITIES

It is essential that the Inspector present their precept to their first point of contact during inspection visits and in accordance with Section 79 of the OSH Act.

10.0 DEALING WITH UNCOOPERATIVE OFFICIALS

With some Industrial Establishments the preliminaries begin at the gate and may involve discussions and sometimes confrontation with security personnel or receptionists. Inspectors should make every effort to avoid such confrontation.

Some managers may refuse to cooperate with the Inspector, provide the least possible assistance, or be outright hostile and in some cases, even aggressive.

In such circumstances, the Inspector should rely on moral persuasion. This would mean explaining in a professional manner to management their obligations as duty holders under the Law, and if possible, some of the benefits to be derived from the intended visit.

The Inspector should also outline persuasively, how his or her work can contribute to the improvement of labour relations, since good health and work conditions for the workers results in better business operation and thus increased profit margins for the employer. Not only is this message important, but also its presentation.

If an Inspector reaches an impasse, it is better to abort the inspection and discuss the matter with his or her supervisor. An immediate, swift reaction to such obstruction is imperative. If necessary, assistance from the Trinidad and Tobago Police Service should be sought.

If the employer is known to be uncooperative and aggressive toward Inspectors, additional preparation may be required for example:

- (i) It may be desirable for a team leader to undertake the inspection, or for a more experienced colleague to accompany a less experienced Inspector. It would also be necessary to consider whether the inspection should be announced.
- (ii) In extreme cases it may be necessary to request a police officer to accompany the Inspector to the worksite. Such occurrence will be considered as an obstruction to the Inspector in accordance with Section 72 (b) of OSH Act and is open to prosecution.

11.0 OPENING MEETING

- The opening meeting will be chaired by the Inspector. In cases where there is more than one Inspector, a lead Inspector shall be appointed by the team or supervisor. In this instance the lead Inspector shall introduce the team.
- The Duty Holder or his Representative should conduct a safety briefing for the OSHA team, and point out any specific hazards.
- The Inspector chairing the meeting shall inform the participants of the purpose of the inspection and outline the proposed format. The Inspector must request that representatives of both the employer and the workers be available for the opening meeting, the inspection and the closing meeting.
- If either party objects to the joint meeting, then the Inspector should conduct separate opening meetings with employer and workers representatives.
- All parties present during the inspection process should sign off on the Meeting Sign-In Sheet as outlined on Appendix III.
- The Inspector at this time will also outline the scope of the inspection.
- The Inspector will also highlight the need for a document review and, the possibility for discussions / interviews with employees without the presence of Employer Representatives during the walk-through inspection.
- There are occasions when an Inspector may decide to go immediately and directly to a section of the industrial establishment, if he or she has reason to believe that a particular problem exists. For example, if an unsafe machine or toxic substances constituting an immediate danger are being used, the Inspector can adjust his or her programme accordingly and start with the “trouble-spot”, thereby foregoing the opening meeting. In these instances, the Inspector should inform management of his or her presence on the facility, and reasons for the immediate visit to the specific area.
- The Inspector must also inform the duty-holders of any course of action that is available to them should they be aggrieved by any decision of the Inspector.
- Duty-holders must also be informed of the rights of employees especially in the context of not being victimised for complying with their duties under the OSH Act.

12.0 DOCUMENT REVIEW

Inspectors may request the following documents for perusal where applicable:

- Occupational Safety and Health Policy
- Risk Assessment
- Emergency Response Plan / drill matrix / drills records
- Evidence of training
- Safety Data Sheets
- Evidence of Safety Meetings
- Evidence of a Safety and Health Committee
- Certificate from the Trinidad and Tobago Fire Service
- Accident registers and copies of Accident notifications submitted
- Collective Bargaining Agreement relating to OSH issues
- Health and Safety Inspection /audit reports
- Competent third-party certification of equipment
- Integrity management / Preventive Maintenance Schedule / Maintenance Records.
- Testing records of Fire Extinguishers, Fire water pump, Sprinklers and Generators
- Noise survey report
- Lighting survey report
- Indoor air quality monitoring assessment reports
- Health Surveillance policy and records
- Corrective action tracking system
- Safe Operating Procedures for specific types of equipment used. This will be determined from the process flow diagram of the operations.
- Evidence of safe work procedures such as permit to work system e.g. Lock out tag out, hot work, confined space etc.
- Competency assessment of workers or operators.
- Contractors' Management Policy

This list is not exhaustive and may vary depending on the nature of operations at the establishments. Documents that are required and maintained in accordance with the OSH Act such as safety and health policy, risk assessment, accident statistics, proof of training, emergency response plan, safety and health committee meetings and fire certificate must be reviewed. Appendix IV shows a detailed Inspection Checklist.

13.0 WALK-THROUGH INSPECTION

The walk-through Inspection should be conducted with a member of senior management or a representative, a union representative or where there is no union, a worker representative. Non-conformances identified should be highlighted to the facilitators. When conducting inspections, follow these basic principles:

- (i) The use of a general or specialised OSHA inspection checklist is an important aid to assist the Inspector in carrying out a planned or unplanned inspection. It is a list of the way things ought to be. The use of checklist helps to clarify inspection responsibilities, controls inspection activities and provides a report of inspection activities. Checklists permit easy on-the-spot recording of findings and comments but be mindful of missing other hazardous conditions which may not be included on the checklist. Use checklists only as a basic tool. When a work area or item of equipment fails this test, it is considered substandard and represents a hazard. Each substandard condition should be assessed and corrective action identified and details documented.
- (ii) Hazard identification, assessment of actual safety and health risks associated with each hazard identified during the inspection. Do not try to detect all hazards simply by relying on your senses or by looking at them during the inspection. You may have to monitor equipment to measure the levels of exposure to chemicals, noise, radiation or biological agents. Take a photograph if you are unable to clearly describe or sketch a particular situation. In the Opening Meeting, the Inspector must state the OSHA's policy on taking photos, and generally not to photograph persons without their permission.
- (iii) Draw attention to the presence of any immediate/imminent danger. Other items can await the final report.
- (iv) The Inspector should if needed, request the Duty Holder Representative to shut down and "lock out" any hazardous items that cannot be brought to a safe operating standard until repaired.

- (v) Do not operate equipment. Ask the operator for a demonstration. If the operator of any piece of equipment does not know what dangers may be present, this is cause for concern. Never ignore any item because you do not have knowledge to make an accurate judgement of safety.
- (vi) Look up, down, around and inside. Be methodical and thorough. Do not spoil the inspection with a "once-over-lightly" approach.
- (vii) Clearly describe each hazard and its exact location in your rough notes. Allow "on-the-spot" recording of all findings before they are forgotten. Record what you have or have not examined in case the inspection is interrupted.
- (viii) Ask questions, but do not unnecessarily disrupt work activities. This may interfere with efficient assessment of the job function and may also create a potentially hazardous situation.
- (ix) Consider the static (stop position) and dynamic (in motion) conditions of the item you are inspecting. If a machine is shut down, consider postponing the inspection until it is functioning again.
- (x) Determine the following: Can any problem, hazard or accident generate from this situation when looking at the equipment, the process or the environment? Look for deviations from accepted work practices. Use statements such as, "an employee was observed operating a machine without a guard." Do not use information derived from inspections for disciplinary measures. Some common poor work practices include the following:
 - using machinery or tools without authority
 - operating at unsafe speeds or in other violation of safe work practice
 - removing guards or other safety devices, or rendering them ineffective
 - using defective tools or equipment or using tools or equipment in unsafe ways
 - using hands or body instead of tools or push sticks
 - overloading, crowding, or failing to balance materials or handling materials in other unsafe ways, including improper lifting
 - repairing or adjusting equipment that is in motion, under pressure, or electrically charged
 - failing to use or maintain, or improperly using, personal protective equipment or safety devices
 - creating unsafe, unsanitary, or unhealthy conditions by improper personal hygiene, by using compressed air for cleaning clothes, by poor housekeeping, or by smoking in unauthorized areas

- standing or working under suspended loads, scaffolds, shafts, or open hatches
- determine what corrections or controls are appropriate.
- Identify breaches of the provisions of the OSH Act.

14.0 CLOSING MEETING

The closing meeting should, as far as possible, be attended by the same persons who attended the Opening Meeting. The Inspector chairing the closing meeting should proceed as follows:

- Express gratitude to management for facilitating the exercise
- Acknowledge any good safety practices observed
- Identify areas of non-compliance observed during the audit or inspection process
- Highlight all the items identified during the document review and inspection in a manner to avoid any misunderstanding
- Identify the follow up action by the OSHA
- Provide a date when the Agency expects to receive any requested information
- Seek and obtain a commitment from the Management of the Company with regards to the timelines for the achievement of compliance
- Summarise any initiatives currently being conducted by OSHA, especially regarding advisory aspects that may be useful to the establishment.
- Provide contact information.

Make management aware of the issues/problems in a concise, factual way. Management should be able to understand and evaluate the problems, assign priorities and quickly reach decisions. Take immediate action as needed. When permanent correction takes time, take any temporary measures you can, such as roping off the area, tagging out equipment or posting warning signs.

15.0 DELIVERABLES FROM INSPECTIONS

When an inspection is completed, the outcome shall include one or more of the following:

- The Inspection Record Form should be completed and sign off by the Representatives. See Appendix V

- An inspection report highlighting any non-conformities, sent to the industrial establishment within seven (7) working days after the inspection. Appendix VI outlines the format/template for an Inspection Report.
- Serving of Improvement and Prohibition Notices.
- Recommendations for prosecution.
- Other directives by the Chief Inspector.
- A minute on file.

16.0 INSPECTION REPORT

The inspection report must be completed and the original report should be sent to the establishment within seven (7) working days after the inspection. The Safety and Health Inspector II may use discretion if it is determined that additional time is required to complete the inspection report. However, the report should be sent no later than two (2) weeks after the date of the inspection, unless specific approval has been given by the Chief Inspector for a longer time period.

A signed copy of the report, together with supporting documents such as the official request from the stakeholder, the meeting sign-in sheet, the inspection record form, copy of the email sent to the stakeholders, fire certificates etc. must be uploaded onto the O share Drive under the Inspectors folder and a signed copy must be placed on the Company's File (Registry Unit).

17.0 CONTENTS OF THE FINAL INSPECTION REPORT

Inspection reports are important. Past inspection reports show what has been identified. They also show what an Inspector or an Inspection Team concentrated on and what areas it did not inspect. The inspection report can draw attention to possible hazards. However, do not simply repeat or copy previous inspections. Use the inspection report to determine whether previous recommendations were implemented. Review the information obtained from previous inspections of the Industrial Establishment, in order to identify where immediate corrective action is needed. Identify trends and obtain timely feedback. An analysis of inspection reports may show the following:

- (i) Priorities for corrective action.
- (ii) Need for improving safe work practices.
- (iii) Insight into why accidents are occurring in particular areas.
- (iv) Need for training in certain areas.

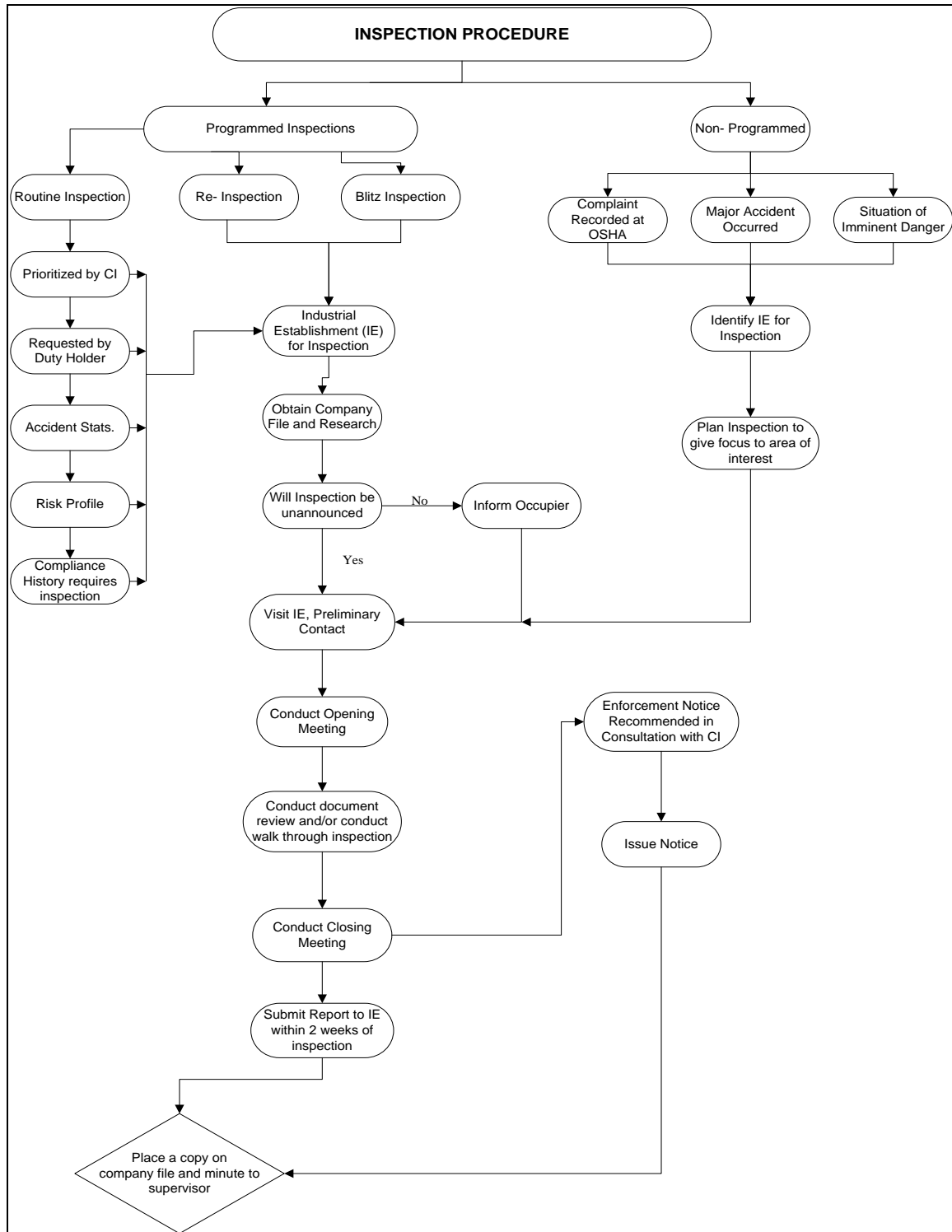
- (v) Areas and equipment that require more in-depth hazard analysis.

To prepare an inspection report, if applicable first copy all unfinished items from the previous inspector report on the new report. Then document the observed unsafe condition and recommendations for corrective action. State exactly what has been detected and accurately identify its location. For example: Instead of stating "machine unguarded," state "guard missing on upper pulley #6 lathe in North Building."

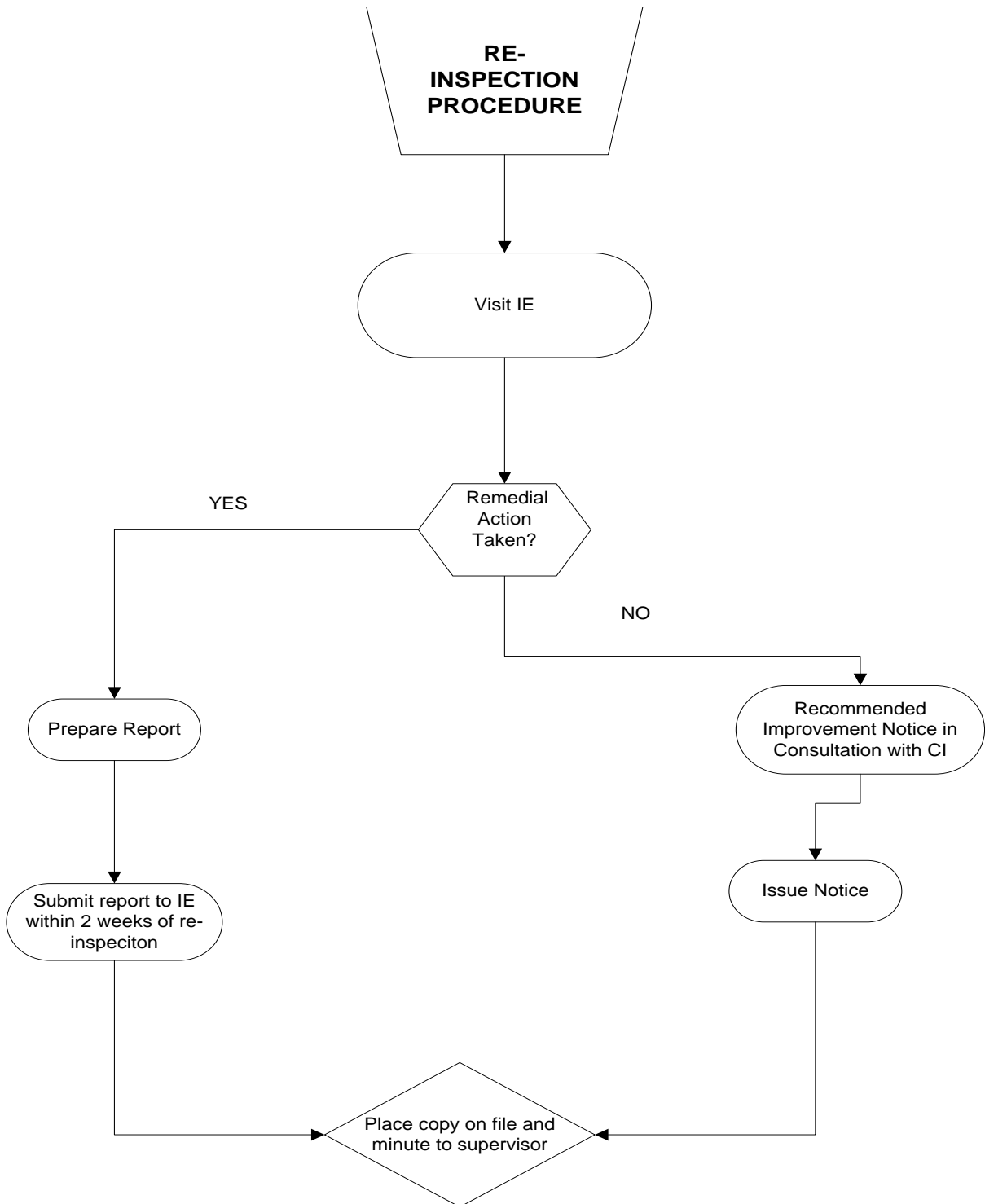
18.0 FORMAT OF INSPECTION REPORTS

- The report should contain at a minimum the following:
 - The correct name and address of the Industrial Establishment.
 - The File Reference number.
 - The names and positions of the facilitators of the inspection.
 - The names of the Inspectors conducting the inspections.
 - The date of the inspection.
 - The findings identified and the relevant breaches citing the relevant Sections of the OSH Act.
 - Assigned categories in accordance to the OSH Act. e.g., General Duty, Fire, Safety, Welfare, Health etc.
 - For re-inspection reports, an additional column should be included on the far right of the breaches table to provide a status of the outstanding breaches. New breaches identified during the re-inspection should be included at the end of the report.
- Each report should be issued to the most Senior Manager of the industrial establishment, with an accompanying forwarding letter. The following shall be included:
 - The correct name and address of the industrial Establishment.
 - File Reference number.
 - The names and positions of the facilitators of the inspection.
 - The names of the Inspectors conducting the inspections.
 - The date of the inspection.
 - The timeline for a status report on the findings identified is to be sent to the OSHA.
 - The proposed re-inspection date (where applicable).

APPENDIX 1: Inspection Procedure Flow Chart



APPENDIX II: Re-inspection Procedure Flow Chart



APPENDIX III: Meeting Sign-In Sheet



Head Office: Corner Eastern Main Rd. & St. John's Road, St. Augustine, Trinidad.
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Telephone: 1 (868) 612-3900, North Office – Ext 1; South Office – Ext 2; Tobago Office – Ext 3

Meeting Sign-in Sheet

Subject:

File No:

Company/Contractor:

Date:

Location:

Time:

No	Name	Company/ Contractor	Job Title	Telephone No.	Signature	Email Address
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						

Topics Discussed / Remarks/ Comments : _____

APPENDIX IV: Inspection Checklist**INSPECTION CHECKLIST**

1.0	Policy – Sections 6(7), 6(7A), 8(2)
1.1	<ul style="list-style-type: none"> i. General policy outlining organisation and arrangements for OSH developed in consultation workers and their representatives ii. Policy submitted to Chief Inspector
1.2	<p>Are arrangements outlined for:</p> <ul style="list-style-type: none"> i. Provision and maintenance of plant ii. Provision and maintenance of systems of work iii. Use, handling, storage and transport of equipment, machinery, articles and substances iv. Provision of PPE or safety devices v. Provision of information, instruction, training and supervision vi. Maintenance of workplace, its access and egress vii. Provision and maintenance of work environment
2.0	OSH Committee – Sections 25E, 25F
2.1	<p>The Safety Committee:</p> <ul style="list-style-type: none"> i. Has been established in consultation with the employee representatives ii. Monitors and reviews safety and health measures iii. Has evidence of OSH issues being investigated by committee or employer
3.0	Training – Section 6(2) (d)
3.1	<p>Evidence of:</p> <ul style="list-style-type: none"> i. Operations training ii. Training in the use of PPEs iii. Training in Emergency Procedures iv. Training for first aider v. Training in safe use of hazardous chemicals
4.0	Emergency Procedures – Sections 8(2)b
4.1	<p>Emergency Procedures:</p> <ul style="list-style-type: none"> i. Written in the Emergency Plan based on the most recent risk assessment ii. Include suitable first aid and efficient transportation to a hospital iii. Include Fire controls; evacuation plan; notification protocol iv. ERP submitted to the Chief Inspector
5.0	Hazard Analysis and Risk Assessment – Sections 13A(1)
5.1	<p>A suitable and sufficient annual risk assessment that accounts for:</p> <ul style="list-style-type: none"> i. Risks to employees whilst at work ii. Risks to third parties
6.0	Fire – Sections 26 – 29

6.1	<p>Fire Preparedness:</p> <ul style="list-style-type: none"> i. Valid fire certificate from the Fire Authority ii. Escape specified in fire certificate is maintained and free of obstruction iii. Firefighting equipment available and easily accessible iv. Employees trained in the use of fire equipment and evacuation procedures
7.0	Health (Medical Monitoring and Surveillance) – Section 25K
7.1	Are employees provided with health surveillance based on the findings of the annual risk assessment?
8.0	Chemicals – Sections 6(3), 6(4), 6(5), 6(6)
8.1	<ul style="list-style-type: none"> i. Chemical safety data sheets available for hazardous chemicals ii. Hazardous chemicals adequately labelled iii. Information on handling and disposal of chemicals and their containers available iv. Inventory of all the required chemical safety data sheets v. Inventory available for examination by employees vi. Safety and health committee in possession of inventory
9.0	Environmental Control – Sections 31, 32, 33, 35 & 36
9.1	<p>Industrial Establishment:</p> <ul style="list-style-type: none"> i. Clean and free from effluvia ii. Respiratory protection provided and well maintained (where necessary) iii. Sufficient and suitable lighting iv. Adequate ventilation v. Adequate space (not overcrowded)
10.0	Noise and Vibrations – Section 34
10.1	<ul style="list-style-type: none"> i. Risks to employees or third parties ii. Measures to control the risk of hearing impairment or diseases caused by vibration iii. Suitable PPE being used by employees at risk of hearing impairment or diseases caused by vibration iv. Initial and periodic medical examinations for employees' risk v. Records of medical examination for employees at risk well maintained vi. Monitoring of workspace where risks exist and proper records kept
11.0	Pregnant Women – Section 6(9) – and Young Persons – Sections 54 & 55
11.1	<p>Industrial Establishment has:</p> <ul style="list-style-type: none"> i. Provisions for the S&H of pregnant employees/nursing mothers/unborn child ii. A register of young persons iii. Medicals for young persons employed for 3 months and more iv. Evidence of training and supervision of young person's operating machines
12.0	Machine Fencing and Safe Guarding – Section 25
12.1	<p>Fencing and Safe Guarding:</p> <ul style="list-style-type: none"> i. Transmission machinery securely fenced or made safe to persons ii. Devices to cut power from transmission machinery positioned in work area

	iii. All dangerous parts of machinery except prime movers or transmission machinery securely fenced or made safe to persons
13.0	Confined Space Section 25(1)
13.1	Are there measures to ensure safe systems of work in confined spaces?
14.0	Unsafe Structures Section 8(4)
14.1	Unsafe structures exist in the industrial establishment
15.0	Notification Of Accidents Section 46, 46A
15.1	<ul style="list-style-type: none"> i. Evidence of written notifications for critical/fatal accidents submitted to the Chief Inspector within 48 hrs ii. Accident register maintained for at least 5 years iii. Written notifications of incidents prejudicial to public safety submitted to the Chief Inspector within 48 hrs iv. Reports of incidents rendering victims unable to work or needing medical attention forwarded to Chief Inspector within 4 days
16.0	WELFARE Section 39, 45b
16.1	<p>Welfare Facilities:</p> <ul style="list-style-type: none"> i. Access to wholesome drinking water at convenient points ii. Separate washrooms for men and women iii. Changing rooms/sanitary conveniences be locked from the inside (5 or less employees) iv. Suitable disposal units for women v. Washrooms are safe, clean, adequate, easily accessible, covered, adequately lit and adequately ventilated vi. Suitable changing rooms, with locks on the inside, and accommodation for clothing provided vii. Restrooms and lunchrooms provided viii. First aid boxes provided, maintained and readily accessible during all working hours ix. Deluge showers, eye baths and other similar first aid devices provided where appropriate x. First aid equipment under the control of persons trained in first aid and available during work hours xi. Emergency health facilities provided in accordance with the risk assessment
17.0	SAFETY Sections 23, 24
17.1	<ul style="list-style-type: none"> i. Suitable PPE provided where necessary ii. Proper notices displayed advertising the protective clothing and devices where necessary iii. Measures to protect employees against the inhalation of dust, fumes or any other impurity that may be dangerous or offensive iv. Measures to prevent the accumulation of dust, fumes or any other impurity that may be dangerous or offensive v. Exhaust appliances provided to prevent contamination of the air in the workroom by dust, fumes or other impurities
18.0	GENERAL DUTIES OF EMPLOYEES AT WORK

	Part II Section 10 (1a), (1b), (1c), (1d), (1e), (1f) ; Section 15
18.1	<p>Employees are aware:</p> <ol style="list-style-type: none"><li data-bbox="397 310 1307 382">i. to take reasonable care for the safety and health of himself and of other persons who may be affected by his acts or omissions at work<li data-bbox="397 388 1258 499">ii. as regards any duty or requirement imposed on his employer to co-operate with him so far as necessary to ensure that that duty or requirement is performed or complied with;<li data-bbox="397 506 1242 577">iii. to report to his employer, any contravention under this Act or any Regulations made thereunder, the existence of which he knows<li data-bbox="397 583 1307 655">iv. to use correctly the personal protection clothing or devices provided for his use;<li data-bbox="397 661 1307 690">v. to exercise the discretion under section 15 in a responsible manner; and<li data-bbox="397 697 1315 802">vi. to ensure that he is not under the influence of an intoxicant to the extent that he is in such a state as to endanger his own safety, health or welfare at work or that of any other person.

No. of employees: Total Male Female

No. of employees between 16-18 years

Action(s) to be taken:

Inspection Report

Prohibition Notice

Improvement Notice

An inspection report detailing the findings to be addressed, as identified during the inspection and discussed with your facilitators along with the consequence of non-compliance with the Occupational Safety and Health Act (Ch 88:08) are attached for your immediate attention. It is expected that these items will be addressed and a report on the status of the corrective measures is submitted to the OSHA within calendar days of receipt of this letter.

A re-inspection of the establishment will be conducted to ensure compliance.

Note that failure to effectively address the findings will result in enforcement action by the OSHA, pursuant to Section 83(1) of the Act. Contravention of any provision or failure to comply with any duty, instruction or directive issued therein is deemed a safety and health offence and is subject to the jurisdiction of the Industrial Court. In this regard, you are directed to make all necessary arrangements to ensure that the aforementioned breaches of the Act are addressed.

For further information or clarification on the above please contact the undersigned ator at the above listed number or send an email to.....

(Phone # of Inspector)

(Inspector's email address)

Employer/Occupier Representative:

.....(Block)

Signature:

Position:.....

Date/...../.....

dd mm yy

Employee/Union Representative :.....(Block)

Signature:

Position:.....

Date:/...../.....

dd mm yy

Safety and Health Inspector:(Block)

Signature:.....

Date:/...../.....

dd mm yy

.....
Company Stamp

APPENDIX VI- Inspection Report Template



Head Office: Corner Eastern Main Road. & St. John’s Road, St. Augustine, Trinidad
Satellite Offices: ♦ #65 Ciperó Street, San Fernando, Lot #2 Glen Road, Scarborough, Tobago,
Website: www.osha.gov.tt
Telephone: 1 (868) 612-3900, North Office – Ext 1; South Office – Ext 2; Tobago Office – Ext 3

(OSHA File No.)

(Date)

(To whom it is addressed)

(Name of Industrial Establishment)

(Address of Industrial Establishment)

Dear Sir/Madam,

Inspection of (IE) **located at** *(Address)* _____

Reference is made to the above inspection that was conducted on *(Date)*.

Present during the inspection were:

FACILITATORS:

Name	Organisation	Position

OSHA

Name	Position

OTHER: *(if necessary)*

Name	Organisation	Position

An inspection report detailing the findings to be addressed, as identified during the inspection and discussed with your facilitators as well as the consequent non-compliance with the Occupational Safety and Health Act (Chap. 88:08) are attached for your immediate attention.

It is expected that these findings will be addressed and a report on the status of the corrective measures be submitted to the OSHA within _____ calendar days of receipt of this letter.

Also, be advised that a re-inspection of the establishment will be conducted within _____ calendar days to ensure compliance.

Additionally, be informed that failure to address the findings may result in the risk of bodily injuries and damages to equipment and the environment.

Note that failure to effectively address the findings could result in compulsory enforcement action by the OSHA. Furthermore, pursuant to **Section 83(1)** of the Act, contravention of any provision or failure to comply with any duty, instruction or directive issued therein is deemed a safety and health offence and is subject to the jurisdiction of the Industrial Court.

For further information or clarification on the above please contact Mr./Ms. _____ at _____ or send an email to _____.

Yours respectfully,

 Safety and Health Inspector
 Occupational Safety and Health Agency

INSPECTION REPORT

Date Inspected:

Company:

Facility:

OSHA:

Facilitators:

CATEGORY	FINDINGS	NON-COMPLIANCE WITH APPLICABLE SECTIONS OF THE OSH ACT (Ch88:08)
GENERAL DUTY		
SAFETY		
FIRE		
HEALTH		
WELFARE		
NOTIFICATION OF ACCIDENTS AND OCCUPATIONAL DISEASES		
EMPLOYMENT OF YOUNG PERSONS		



INSPECTOR FIELD MANUAL

Version 01/2022

Targeting Procedure

Introduction

Through the Targeting Programme, the Occupational Safety and Health Agency (“OSHA”) shall ensure the prioritization of all industrial establishments (“IE”) with high-risk or hazardous operations during enforcement activities. The Targeting Programme shall also ensure oversight of the efforts made by an IE to improve their overall compliance and safety performance.

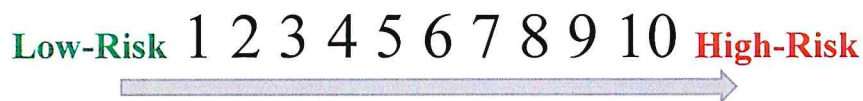
OSHA shall rely on data obtained from its operations in order to better coordinate all enforcement efforts and place significant focus on IEs with consistently poor safety performance. In particular, OSHA shall focus its enforcement activities on those IEs with high rates of workplace injuries, illnesses and a record of repeated deviation from the approved standards and legislative requirements as it relates to safety and health.

Prioritizing Methodology

1. In order to determine which IEs shall be targeted on a quarterly basis, OSHA shall first assess and compare the **Priority Level** of each IE. When assessing the Priority Level, the following will be considered:- Overall Risk Rating
2. Overall Non-Compliance Level

Overall Risk Rating

All IEs shall be assessed and ranked, based on the nature of the industry or processes conducted at the establishment, ranging from low-risk to high-risk and given a risk rating value between one (1) and ten (10) (1 being the lowest risk and 10 being the highest risk).



High-Risk IEs

High-Risk IEs shall be classified as any facility that possesses the possibility of major uncontrolled emission, fire or explosion, involving hazardous chemicals, which can present serious danger to employees and other persons in the vicinity of the work place; and /or harm to the environment.

Some examples of high-risk establishments include:-

- Terminals
- Tank farms
- Gas Processing facilities

- Petrochemical plants
- Other major chemical plants
- Drilling rigs
- Platforms
- Bunkering facilities
- Refinery
- LPG plants
- Pipeline network
- Large construction sites

All high-risk establishments shall automatically be assigned a value of Ten (10) on the 'Overall Risk Rating'. The recommended targeting frequency is one (1) inspection per year, except when targeted by weighting system.

Overall Non-Compliance

The overall compliance value shall be based on the information obtained by OSHA from an IE during enforcement operations. In order to complete this, the following criteria will be assessed and given a value:-

1. Accident rates
2. Enforcement notices (number and seriousness)
3. Complaints (number and seriousness)

Subsequently, the summation of the values for each criteria will generate a final value, with zero (0) being the minimum and ten (10) being the maximum possible values attainable.

Table 1 – To show the Overall Non-Compliance scoring criteria

Weighted Performance Value			
Main Criteria	Sub-Criteria	No. Awarded	Final No.
Fatal Accidents	No Fatalities for the current year	0	
	1 Fatality per year	1	
	> 1 Fatality per year	2	
	1 or more fatal + 1 or more critical accidents per year	2	
Critical Accidents	No Critical accidents for the current year	0	
	1-3 Critical accidents per year	1	
	> 3 Critical accidents per year	2	
Non-Critical Accidents	No non-critical accidents for the current year	0	
	1-3 Non-Critical accidents per month	1	
	> 3 Non-Critical accidents per month	2	
Enforcement Notices	No enforcement notices issued within the current year	0	
	1 Improvement Notice per year	1	
	2> Improvement Notices per year	2	
	1 or more Prohibition Notice per year	2	
Justified Complaints	No complaints made during the current year	0	
	Moderate complaints	1	
	Widespread complaints	2	
TOTAL VALUE (to be used in the Y-Axis)			

Priority Matrix

A ten (10) X ten (10) matrix will be used to calculate a final prioritization score. After determining the Overall Risk Rating, where the subsequent value will be reflected on the **X-Axis**, it will then be matched against the Overall Non-Compliance value on the **Y-Axis** to determine the IE's prioritization score and respective **Priority Level**.

The Priority Levels will be explained further in the following section.

Table 2 – To show the Priority Matrix (10x10)

Overall Non-Compliance	10	10	20	30	40	50	60	70	80	90	100
	9	9	18	27	36	45	54	63	72	81	90
	8	8	16	24	32	40	48	56	64	72	80
	7	7	14	21	28	35	42	49	56	63	70
	6	6	12	18	24	30	36	42	48	54	60
	5	5	10	15	20	25	30	35	40	45	50
	4	4	8	12	16	20	24	28	32	36	40
	3	3	6	9	12	15	18	21	24	27	30
	2	2	4	6	8	10	12	14	16	18	20
	1	1	2	3	4	5	6	7	8	9	10
	1	2	3	4	5	6	7	8	9	10	
Overall Risk Rating											

Priority Levels

In accordance with the Agency's **Inspection Procedure**, under the **Additional Guidance** section, there are four (4) possible performance levels that can be assigned after assessment.

The Targeting Programme will draw reference from the four (4) performance levels in order to establish Priority Levels to classify IEs.

The four possible Priority Levels are:-

- Level 1 – Sustainable compliance
- Level 2 - Limited non-compliance
- Level 3 - Significant non-compliance
- Level 4 - Extreme/widespread non-compliance

Priority Levels Description

Table 3 – To show the Priority Levels Description

LEVEL 1	LEVEL 2	LEVEL 3	LEVEL 4
<p>SUSTAINABLE COMPLIANCE (<16)</p>	<p>LIMITED NON-COMPLIANCE (16-34)</p>	<p>SIGNIFICANT NON-COMPLIANCE (35-56)</p>	<p>EXTREME WIDESPREAD NON-COMPLIANCE (57-100)</p>
<p>High/ satisfactory level of compliance in key areas of operations. Acceptable standard; efforts to maintain</p> <ul style="list-style-type: none"> • Low-risk/ low-impact industry. • No Critical or Fatal accidents reported. • Very limited or no non-critical accidents reported. • Very limited or no complaints. • Very limited or no enforcement notices issued. 	<p>Broad compliance in some areas that matter. Acceptable but must employ efforts to reduce score.</p> <ul style="list-style-type: none"> • Medium-risk/ medium-impact industry. • Limited or no Critical and Fatal accidents reported. • Few number of non-critical accidents reported. • Few number of complaints. • Few number of enforcement notices issued. 	<p>Some compliance efforts but still very poor overall safety performance.</p> <ul style="list-style-type: none"> • High-risk/ high-impact industry. • Critical or Fatal accidents reported. • High number of non-critical accidents reported. • High number of Complaints. • High number of enforcement notices issued. 	<p>Unacceptable/ Limited or no compliance to protect employees safety, health and well-being.</p> <ul style="list-style-type: none"> • Very high-risk/ high-impact industry. • Critical or Fatal accidents reported. • High number of non-critical accidents reported. • High number of Complaints. • High number of enforcement notices issued.
<p>Re-Inspection Frequency 1/36-Months</p>	<p>Re-Inspection Frequency 1/18-Months</p>	<p>Re-Inspection Frequency 1/12-Months</p>	<p>Re-Inspection Frequency 4/12-Months</p>

IEs that possess a score of fifty-six (56) or more on the Priority Matrix will be classified as a ‘**Level 4**’ (highlighted in red in **Table 1** and **Table 2**) and will be flagged for targeting by OSHA.

Initial Site Visit and Inspection

IEs that have been classified as **Level 4** priority will be flagged for inspection. OSHA shall deploy Inspectors to conduct an initial inspection and audit of the targeted IE/s.

Within two (2) weeks of the initial site visit, an Inspector shall contact the targeted IE in order to conduct a presentation and awareness session. The session will aim to inform the IE on their Priority Level and why they are of interest by OSHA. In order to explain why an IE is of

interest, the Inspector will highlight statistical data on the **IE's** shortcomings (as it relates to compliance with the OSH Act) over a specified period.

During the presentation, a list of action items and respective timelines (based on the IE's Priority Level) generated from the initial inspection and audit, shall be sent to the IE in the form a report.

OSHA shall continue to work closely with the IE to ensure that action items are being addressed. **(Note:- this action does not exempt the IE from enforcement action)**

Re-inspection and Reduction Criteria

OSHA shall conduct subsequent re-inspections and determine whether the IE has successfully addressed all items on the action list. The re-inspection frequency shall be in accordance with the IE's Priority Level shown in Table 3.

During the re-inspection, in order to determine the changes in the IE's performance and reduction in the Priority Level, the following performance criteria will be used.

Table 4 – To show the Re-inspection scoring criteria.

Weighted Performance Value			
Main Criteria	Sub-Criteria	No. Awarded	Final No.
Re-assessment of Overall Risk Rating	Low risk company and related processes	0	
	Medium risk company and related processes	1	
	High risk/ high impact company and related processes	2	
Compliance with Enforcement Activities	> 80% compliance level	0	
	50% - 79% compliance level	1	
	0% - 49% compliance level	2	
Willingness to comply with Enforcement Activities	Displayed a high level of due diligence and willingness to comply. All action items are greeted with efficiency	0	
	Reasonable attempt to improve compliance level, however, non-conformances still remain	1	
	Repeated non-compliance without any reasonable change/ Failure to meet deadlines/ No effort made	2	
Reduction in Reportable Accidents	Maintained 0 accidents/ Reduction in all types of accidents (critical, fatal and non-critical) to 0	0	
	Reduction in critical and fatal accidents, but not non-critical accidents	1	
	No reductions in accidents/ Continued increase	2	
Deviation from defined/ established standards	No deviation/ strict adherence to defined or established standards resulting in reduction in all types of notices /action items	0	
	Limited adherence to defined or established standards resulting in limited reduction in notices/action items	1	
	No change or reduction to amount action items sited to adhere to defined or established standards	2	
TOTAL VALUE (Score to be used on the Y-Axis)			

The criteria in **Table 4** shall replace **Table 1** during the re-inspection. The results from **Table 4** shall determine the new Non-Compliance value that will be used on the y-axis of the Priority Matrix. The results generated from the re-inspection shall determine whether an IE has successfully improved their priority rating (which will be demonstrated by a reduction in the previous rating and transition into a lower Priority Level).

Re-inspection and Closing

There are two (2) main outcomes that occur when closing off a targeting cycle for an industrial establishment. The two (2) outcomes are as follows:-


- The IE successfully achieved a reduction in Priority Level and is no longer targeted.
- The IE fails to achieve a reduction in Priority Level and demonstrate their commitment to ensuring a safe workplace.

An IE will no longer be of interest when it has successfully achieved a reduction in Priority Level to **Level 3** (highlighted in orange in Table 3 and Table 4) or lower. Correspondence to support the same will be submitted to the IE and the Targeting Programme Cycle will be closed off.

If an IE has made no significant effort to address action items, OSHA will take action against the IE for poor safety performance in order to close of the Targeting cycle. The ultimate goal of the Prioritizing Programme is to encourage IEs to ensure compliance with the Act and provide a safe working environment for their employees. An IE that fails to demonstrate its dedication to ensuring a safe workplace for their employees shall face strict enforcement action.

This procedure will be reviewed every two years subject to any legislative and/or procedure requirements.

Approved by the Occupational Safety and Health Authority on 28th September, 2022.



.....

**Chairman
Occupational Safety and Health Authority**

Targeting Procedure Reference Number: OSHA/IFM/PRO/01/2022

Effective Date:

Revision Date:

