



Safety Training – Do What’s Right, Not Just What’s Required

By Jonathan Jacobi, senior EHS advisor; UL

Identifying training needs is easy in the aftermath of a workplace incident. At that point, however, the discovery is too late for the injured. As a senior EHS advisor at UL, I believe a better approach is to understand training needs (and provide training), so workers are able to identify workplace hazards and take precautions that prevent incidents. Where do you begin?

Identifying Needs

Some training is overtly and explicitly required by law or regulation if someone works in a certain type of industry, performs certain types of tasks or is potentially exposed to certain types of hazards. For instance, all workers need to understand egress and emergency action plans and anyone who drives a forklift also needs powered industrial truck training. If you have heard of companies training for compliance, they have been undertaking this type of training.

Employers also use training to address hazard and risk exposures, even in the absence of specific regulatory standards. Failing to provide training that would have helped workers avoid hazards may leave employers exposed to regulatory “catchall” clauses (like Occupational Safety and Health Administration’s (OSHA) General Duty Clause), civil liability and humanitarian backlash following preventable incidents.

A company must understand its operations to choose appropriate training. Job description reviews can help determine hazard and risk exposures that trigger training needs. However, it’s important to note that job descriptions are not always kept up-to-date when responsibilities change and brief descriptions may omit details vital to determining training needs. Delivering a survey to encourage self-identification of hazard and risk exposures can help further define training needs. Employee interviews, Job Hazard Analysis and Job Safety Analysis (JHA/JSA) reviews, incident reviews, observations, industrial hygiene data and operational familiarity are other ways to determine who needs certain types of training.

The [OSHA Publication 2254: Training Requirements in OSHA Standards](#) provides a good starting place for those seeking to understand workplace health and safety training requirements.

When should training be conducted?

The best time for training depends on the job at hand and often occurs in multiple stages. Training is rarely a “one and done” event.

Train initially. Training is needed before the first potential exposure to hazards. This means you need to train your employees before they enter certain areas and perform certain tasks. Some regulations allow a period of supervised work while training programs are being completed. Training to check a compliance box is necessary. Still, there are more effective approaches when it’s critical for workers to apply knowledge and skills to potentially dangerous jobs.

Train to refresh and remind. While it’s best to conduct training near the time when knowledge and skills will be utilized, invariably, some training will end up occurring long before it’s needed. Retaining knowledge and skills becomes increasingly difficult over time when they are not reinforced in practice. For this reason, retraining is vital before high-risk and infrequently performed tasks. Leading companies strive to make learning a continual process. The best companies capture and share information about what’s working as well as what’s not. They make sure that support materials are available when and where work is performed. Knowledge retention goes way up when employees can access training and information that is relevant to the work at hand.



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Powered industrial truck training is a good example of the type of training topic employers should perform more frequently than required by regulation. In the United States, Federal OSHA requires training prior to initial operation. According to OSHA, forklift and other powered truck retraining is not mandatory unless there have been incidents or other reasons to suspect a lack of knowledge and competency. But, because of the high potential for severe incidents and to keep all operators grounded in the fundamentals, many companies provide this training on an annual or biennial basis.

Train after changes. Many standards require training periodically and when workplace changes render previous training obsolete. For instance, retraining is needed after changes to energy isolation procedures, after changes to confined space entry procedures and when there have been changes to protective equipment provided.

Train after incidents. While people have all sorts of reasons for their actions, managers and supervisors need to determine if lack of knowledge and skills contribute to workplace incidents. Retraining is needed (and may be required) if knowledge and skills have eroded. But before re-doing anything, ask, “why didn’t this work the last time?” The exact same training may not be what’s needed this time. Next, realize that retraining everyone post-incident (even people who are proficient) may be harmful to culture and may also leave the real problems (e.g., inadequate time, equipment, material and other support) unaddressed. Training may help, but it usually isn’t the only thing needed.

How should training be conducted?

Standards can be extremely specific and include directives concerning topics to be covered, practical exercises, minimum seat time, instructor qualifications and more. Other times, standards will require training without elaborating on training expectations.

In any event, these are some best practices to consider when refining your training program:

- Companies must make an effort to deliver training that is relevant to audience needs and experiences. Relevant training underscores the risk presented by workplace hazards. Risk drives the motivation to listen, learn and follow precautions when unsafe shortcuts are available.
- Properly performed training and training follow-ups facilitate important dialogue between trainer/coach and worker. Learning can offer benefits that extend beyond the classroom when organizations get past the notion of fixed roles such as teacher, trainer, student and trainee. Everyone has something to contribute and something to learn; this includes trainers learning from trainees. Respecting the intelligence and insight of trainees goes a long way toward breaking down barriers to sharing. This means talking rather than telling. This means listening with an interest in learning.
- Training that rehashes what workers already know will not give rise to learning, but it may create resentment. Skilled trainers recognize what trainees already know and step from behind the podium, pushing for a collaborative experience co-led by resident experts within the audience. In the end, it doesn’t matter who’s doing the training so much as who leaves trained.
- The [OSHA Publication 3824: Resource for Development and Delivery of Training to Workers](#) provides other tips for companies seeking to refine the development and delivery of workplace health and safety training.



Addressing the elephant in the room

I frequently facilitate classroom training sessions. I also work for a company that provides online computer-based training. So, which format do I like best: computer-based or instructor-led training?

I like online training. I like instructor-led training. I even like DVD videos and independent, community-based learning that can happen through online safety blogs and forums.

What I don't like is someone saying that there is only one good way to train. In addition to being terribly bland, this does not take into account trainee preferences, learning styles, subject matter and organizational limitations.

While I work for a company that provides e-learning, I have never argued against other approaches to training. In a blended approach to training, many methods are used to help ensure quality learning outcomes. I recommend a blended approach.

How does OSHA feel about blended training? To answer that question, let's consider the OSHA standard on powered industrial trucks:



“Training shall consist of a combination of formal instruction (e.g., lecture, discussion, interactive computer learning, videotape, written material), practical training (demonstrations performed by the trainer and practical exercises performed by the trainee) and evaluation of the operator’s performance in the workplace.”

A beautifully written standard.

It seems that traditional classroom-based instructor-led training options would always be preferred for quality interactions with trainees. However, not everything is best shared in group settings. Some workers will deny trainers crucial, potentially controversial and sensitive information when discussions happen within the political confines of large group sessions. It really depends on the subject matter and culture of the organization.

When selecting online training, realize that some of the time saved should be reinvested into the safety system (i.e., online training may free your time for meaningful, non-threatening, rapport-building interactions). Trainers have grossly missed the mark if they choose online and discontinue other personal interactions.

Arguing about our favorite approach is not productive. We should open our minds to the various approaches that are both efficient and effective. A blended approach can lead to the highest quality learning outcomes.

Do what's right, not just what's required

Prescriptive training requirements seem to offer convenient answers to the “who, what, when, why and how” questions. You learn the standards; you do what the standards say. Workplace health and safety is never that simple. Many threats lack associated training standards. Many standards that suggest training lack prescriptive detail. Employers must fulfill their general duty to provide a safe workplace by surveying for hazards, defining precautions and educating their workforce.

Companies should always seek to do what's right, not just the minimum required. “Read this and sign here” training efforts commonly fail when it comes to improving performance; what's more, they can leave a company exposed to costly fines and penalties for failing to ensure information is understood and can be applied.

Training done poorly wastes an enormous investment. The investment in training includes wages and the opportunity cost of other work not performed while training. As for less tangible costs, training that insults the intelligence of trainees tends to create resentment, demotivate and may even serve to lower self-esteem and self-confidence.

Few organizations can afford to simply meet compliance obligations; there must be other benefits to offset training investments. Do what's right (not just what's required) and train to learn to reap the full benefits training can offer.



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