



## Safety Duties To Those Remote Or Isolated Employees.

Insights

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Many employees work alone at a customer's site or on the road with no immediate supervision or the presence of a safety professional to check for hazards. Some employees, such as journeymen electricians and certified crane operators are trained to operate with minimal supervision. Other workers may be less trained or less equipped to individually analyze their setting. Unfortunately, both types of isolated workers may violate OSHA standards, and preventing that misconduct is more of a problem when employees are working alone.

The employer has a duty to ensure their employees' safety even where the employer has no supervision or safety professionals on site. In almost all situations, the employer cannot delegate this responsibility to others for even the most skilled workers.

So a balance must be struck.

Employers may fail to establish programs to effectively supervise these often-highly skilled employees. Or one may have a solid system in which employees confer throughout the day with supervisors, dispatchers and technicians, or the employer may have trained employees to exercise greater responsibility when working alone, but are these procedures documented?

In addition to the practical need to ensure your employees' safety, OSHA may cite you for inadequate safety measures when remote employees are hurt. Consider how your operation would look in a *"Monday morning quarterback"* scenario. OSHA may envision supervision or a safety professional checking on the work or surveying the site. Such actions may not be practical for businesses such as a ready mix delivery or a skilled technician working alone on controls.

Employers must continuously remind employees to always pause, consider the site or job's hazards, and take steps to avoid the hazards. Sure . . . that's how we expect all employees to operate . . . but with isolated employees, you must really beat this into employees' heads, and devise processes to remind them to take this approach. Emphasize to such workers, their unique role of having to in essence, conduct their own site safety or hazard analysis. One employer described the "TRACK" mantra their employees follow:

Stop, and

Think through the task  
Recognize the hazards  
Assess the Risks  
Control the Hazards  
Keep safety in all tasks

Under construction OSHA standards 1926.20 and 21, an employer must:

(20(b)(2)) maintain accident prevention programs providing for frequent and regular inspections of the job sites, materials, and equipment to be made by competent persons. . . .

(21(b)(2)) the employer shall instruct each employee in the recognition and avoidance of unsafe conditions and the regulations applicable to his work environment to control or eliminate any hazards or other exposure to illness or injury.

**How does the employer meet its obligations when no supervisory or safety personnel accompany the workers?**

Possible actions might include:

- Employers must document thorough training to equip the employees to recognize and avoid hazards.
- The employer should determine the probable range of hazards employees may encounter at various types of jobs . . . and document that it actually carried out such an analysis. Many jobs and sites are similar, and it should be possible to determine the routine hazards. Now, go a step further and consider “non-routine” hazards.
- Establish a rule, procedure or form that requires supervision to pause when assigning employees to non-routine jobs, or assigning employees to jobs with which they are less familiar. In these situations, additional training or some type of safety analysis may be necessary.
- Require employees to at least complete a very basic and short site safety analysis for those small remote jobs. Many electrical and other specialized contractors require the employee to complete a few questions on the work order paperwork requiring the employee to pause and consider hazards.
- Consider using tablets or phone apps for the hazard analysis, and as a means of tracking compliance and providing advice.
- Establish procedures for employers to call in whenever they have any questions or concerns.
- Consider whether it is feasible to spot check line crews, technicians, deliveries, or small crews. Do you do any sort of quality spot checks or inspect final work?
- Consider safety concerns unique to each site, such as lockout for electricians, skylights for those working on roofs, or overhead power lines.
- Ensure that JSA’s are thorough, accurate and consider challenges posed by customer sites.

- Ensure that employees know that you will back them if they refuse unsafe demands by customers.
- If remote employees seldom report to one of your sites where safety and other concerns can be regularly addressed, consider a regular teleconference. Many remote workers may work from home or travel from motel to motel.

### ***Related People***



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