

Safety Training

**City of Tulsa
Internal Auditing
March 2008**



Safety Training



A handwritten signature in blue ink that reads 'Ron Maxwell'.

Ron Maxwell, CIA, CFE
Chief Internal Auditor

A handwritten signature in blue ink that reads 'Phil Wood'.

Phil Wood, CIA, CFA
City Auditor

AUDIT TEAM:

Cathy Criswell, CPA, CIA
Seth Potter, Auditor in Charge

Summary of Audit Project

Scope:

Evaluate the internal control framework of Safety Training.

Objectives:

- Evaluate and conclude on each component of the internal control framework and the internal control framework, as a whole.
- Provide improvement suggestions, as appropriate.

Overall Risk Exposure: (Low, Moderate or High)

MODERATE

Conclusion: (Satisfactory, Satisfactory-needs improvement, or Unsatisfactory)

SATISFACTORY-NEEDS IMPROVEMENT

Significant Project Results:

- Weekly meetings provide a good communication channel for employees
- Employees are comfortable communicating with supervisor and manager
- Long-tenured employees understand their duties
- Management is highly involved in daily operations and in touch with employee activity
- Safety Specialist's knowledge of subject matter and presentation skills are not adequately evaluated by management (Audit Finding 1)
- Safety Specialists are not given specific continuing education requirements (Audit Finding 2)
- There is no oversight group/committee that provides a city-wide view of risks that affect employee safety (Audit Finding 3)
- Employee procedures and authority are not formally communicated (Audit Finding 4)
- Information used to prepare the monthly collision review agenda may be incomplete (Audit Finding 5)
- There are no formal procedures to monitor changes in laws and regulations. (Audit Finding 6)
- Fixed assets are not appropriately safeguarded. (Audit Finding 7)

Responsible Officers: Human Resources Director Jeff Wilkie, Interim Manager of Safety and Training Pam Marrs, and Senior Safety Specialist Eddy Tijerina.

Introduction

The Safety Training section of the Human Resources Department conducts professional safety training for all departments. Safety Training investigates collisions and injuries involving City of Tulsa vehicles, conducts periodic facilities and jobsite inspections, and develops safety and health policy and procedures.

City policy requires Safety Training to conduct a minimum of 100 half-hour training sessions each year. Safety Training conducts safety orientation for newly hired City of Tulsa Employees, safety training required to fulfill the City of Tulsa's progression requirements, training to receive commercial driver's licenses, and certification to operate heavy equipment and machinery. Safety training is also provided at the request of City of Tulsa departments.

Safety Training investigates collisions and injuries involving City of Tulsa vehicles or machinery. Safety Training is notified when a collision occurs. A safety specialist is assigned to perform the collision investigation. On a monthly basis, the Accident and Collision Review Committee meets to review vehicle accidents. Safety Training prepares the agenda for this meeting.

On a quarterly basis, Safety Training prepares a Collision Report analyzing the data to be given to the Management Safety Committee for review. If any trends in accidents are recognized as a result of the Collision Report, Safety Training responds with appropriate training to mitigate risk exposure to the City of Tulsa.

Safety Training is required to conduct 560 jobsite and facility inspections per year. Ninety of these inspections must be class "A" or "B" Facilities. A facility and jobsite inspection findings spreadsheet is maintained by the Senior Safety Specialist.

Safety Training is responsible for maintaining and developing safety manual policies and procedures and providing administrative support to departments on safety concerns. Safety Training performs safety audits for City of Tulsa Departments ensuring all appropriate paperwork is maintained.

AUDIT FINDING 1:

Safety Specialists' knowledge of subject matter and presentation skill are not regularly evaluated.

SUMMARY:

Research suggests that a best practice for a training program includes an annual review by the Training Director. The annual review should include an observation of an instructor's delivery, a review of the observation with the trainer and an analysis of the instructor.

Safety Specialists receive feedback during the Performance Planning and Review (PPR) process. The PPR process does not adequately evaluate the Safety Specialists' knowledge of the subject matter or the effectiveness of their delivery. The PPR process is performed on an annual basis and may not provide feedback in a timely manner so that specialists can improve their performance.

RECOMMENDATIONS:

Management should establish a formal review process to evaluate the Safety Specialists based on content of presentation and delivery.

Management should further consider requiring the Interim Manager of Safety Training and the Senior Safety Specialist to attend technical or non-routine training conducted by each Safety Specialist for the purpose of evaluating employee performance.

RESPONSE:

Currently the Safety Specialists turn in participant evaluations for the training they conduct. A standard will be set on their PPR's for at least 90% of those to show "meets the objective of the training" in order to receive a proficient rating. The Safety Specialists will also review their participant evaluations immediately following training classes taught to determine needed improvements for future training.

The Manager of Development Programs Administration and the Senior Safety Coordinator will attend at least one training class taught by each Safety Specialist quarterly and provide feedback to the Safety Specialists immediately following the training.

AUDIT FINDING 2:

Safety Specialists may not be adequately trained.

SUMMARY:

Research suggests that trainers should be required to maintain professional competency by participating in continuing education or professional development programs or by completing an annual refresher course. Management communicates during the interview and PPR process that training will be provided. There is no schedule of training that is required to be completed by the trainers to ensure that job skills improve or stay adequate. As a result, training offered by Safety Training could be inadequate to keep City of Tulsa employees working safely, and thereby, insufficiently reducing risk exposure to the City of Tulsa.

RECOMMENDATION:

Safety Training management should prepare a formal written list of minimum training required for each position in the department, including training on City of Tulsa policy, procedures, and safety programs. Training should include technical training for each level to maintain or improve current skill sets. Management should ensure each new employee to the department receives and reviews this list. Management should continue utilizing the PPR process to monitor employees understanding of training requirements and to monitor progress of each employee's training.

RESPONSE:

We are currently developing training programs that include using internal resources such as TPD, TFD, and City Medical for collision investigation training, fire safety training, and medical information; we are also pursuing topic specific training through professional organizations that can assist with safety professional certifications such as the Oklahoma Safety Council. All of the Safety Specialists have been provided subscriptions to safety and health publications as well as OSHA bulletins, by attending safety and health conferences, will be provided opportunities to network with peers in other companies and organizations.

AUDIT FINDING 3:

Performance measures have not been updated.

SUMMARY:

Safety Training has developed performance measures which are documented in the Safety and Health Manual. These performance measures have not been updated for some time. Management and employees stated they want updated performance measures which clearly define their objectives. Per discussion with the Senior Safety Specialist, Safety Training should have a committee composed of city department representatives to help perform a risk analysis and to set relevant and measurable performance standards and objectives.

RECOMMENDATIONS:

Internal Auditing supports formation of a committee to set and monitor safety performance measures. Safety Training should collaborate with the departments they serve to form a committee. This committee should discuss performance measures for each department and create relevant objectives for Safety Training.

Management should consider allowing this committee to perform an oversight function and having the committee convene frequently enough to evaluate Safety Training's progress towards meeting its objectives.

RESPONSE:

Currently the Management Safety Committee (comprised of department directors and representatives from the Mayor's office) meets on a quarterly basis. The Management Safety Committee has given HR/Safety the task of reducing collisions and injuries by 10% of a 3 year average. The numbers for both injuries and collisions are compiled and reported to the Committee each quarter.

Safety would suggest adding to the information provided to the Management Safety Committee a report showing facility and job site inspections conducted with a report on violations found.

The Performance Measures found in the Safety and Health Manual will be reviewed for updates.

AUDIT FINDING 4:

Employee procedures and authority are not formally communicated

SUMMARY:

Assignment of authority to Safety Training employees should be clearly communicated to minimize risk of loss to the City of Tulsa and its citizens. Safety Training relies on the Safety and Health Manual to outline and communicate the assignment of authority. The Safety and Health Manual portions relating to operating activities have not been updated since 7/8/1994. Management does not evaluate if Safety Specialists understand or are aware of operating objectives.

RECOMMENDATIONS:

Management should aggressively update the Safety and Health Manual and implement internal controls to ensure the Safety and Health Manual is updated on a regular basis.

Management should document standard operating procedures outlining specific authority and job duties and responsibilities for each level of employment in Safety Training.

RESPONSE:

A schedule to review the Safety and Health Manual will be set to occur annually and revise or update as needed. There are currently several S&H policy revisions in process (current process requires the revisions to be approved by the Management Safety Committee, Legal and finally the Mayor before going into effect).

Authority assignment will be reviewed with the Safety Specialists during their upcoming performance planning sessions.

AUDIT FINDING 5:

Information used to prepare the monthly collision review agenda may be incomplete.

SUMMARY:

The agenda for the accident review committee needs to be complete so that collisions and disputes over collisions are resolved in a timely manner. Safety Training monitors trends each month by preparing the agenda for the Accident and Collision Review Committee.

City of Tulsa employees who are involved in an accident are required to contact Safety Training to report the collision prior to leaving the scene of the accident. The call is directed to the Senior Safety Specialist who assigns an available Safety Specialist to the investigation. In the event that the Senior Safety Specialist is unavailable, detailed instructions via the city's voicemail system are given informing the caller which Safety Specialist to contact.

When the Safety Specialist has completed an investigation, a report is completed and turned into the Senior Safety Specialist for review. Once the Senior Safety Specialist has completed their review, the report is given to the Safety Training administrator to be entered into the database. The agenda for the collision review committee is then prepared on a monthly basis using data from the database. There is no procedure to ensure all the accidents have been entered into the database and included on the agenda.

RECOMMENDATION:

Management should consider creating a log to track all accidents and collisions. Management should then compare the accident log to the agenda to ensure all accidents are reviewed on a timely basis by the Accident and Collision Review Committee.

RESPONSE:

The process will be changed so that after each collision is investigated, the specialist who conducts the investigation will immediately enter it onto the collision log. There are other safeguards in place in that the employee has not only reported their collision to Safety, but also to their supervisor who will be looking for the results of the Collision Review Committee to be sent directly to them.

In the event an employee would be involved in a collision and not report the damage done to the City vehicle, EMD will pick up on that at the time of a PM Service and notify Safety of the damage.

AUDIT FINDING 6:

There are no formal procedures to identify and monitor changes in laws or regulations.

SUMMARY:

Safety Training does not have a policy or procedure to monitor changes in laws and regulation. Staff relies on networking with other safety professionals and membership in the Oklahoma Safety Council (OSC). The Senior Safety Specialist receives e-mails or information from vendors or the OSC and forwards the information to the appropriate person in the department.

RECOMMENDATION:

Management should monitor changes in the applicable laws and regulations. Management should communicate regulatory changes to the safety staff and to the departments they serve.

RESPONSE:

We currently subscribe through BLR to an OSHA bulletin that provides monthly updates and notices of any changes in regards to OSHA rules and regulations. Any changes that affect the City and our employees are communicated to the LT Safety Committee and the Management Safety Committee as well as any other areas that would affect our ability to comply (uniform committee, contract negotiating team, etc.)

Safety will write a procedure for reviewing the literature for updates on a regular basis.

AUDIT FINDING 7:

Fixed assets are not appropriately protected from theft or misappropriation.

SUMMARY:

Executive Order 92-17 requires department property coordinators to take an annual inventory of fixed assets. Safety Training does not take inventory on a regular basis. Per discussion with the Senior Safety Specialist, the Human Resources Department takes an inventory occasionally. It is further noted that fixed assets should be properly secured at all times.

RECOMMENDATION:

Management should develop procedures to ensure that a physical inventory of assets is taken on an annual basis. Management should also consider methods to further protect fixed assets. Methods management could consider are the use of a security gate or a global positioning system.

RESPONSE:

A process is being developed to coordinate the fixed asset inventory (rolling stock) to include regular preventative maintenance, damage/repair, employee/department use, etc. for all equipment in HR/Safety possession. Consideration is being given to making the Safety Training Center grounds more secure during different times of the day/week. This issue will likely have a budgetary impact.

Distribution List

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