



Commonwealth of Massachusetts Executive Office of Labor and Workforce Development Department of Labor Standards

Executive Order #511 Consideration of Health and Safety Hazards for Employees Conducting Work at External Sites

State employees, such as inspectors, case workers, etc., may be entering sites that are under the control of another employer, or may not even be workplaces at all (e.g., residential homes). Even though the inspector's agency does not have control of the space their inspector is entering, his/her safety is still the responsibility of the agency as their employer.

When completing the hazard assessment questionnaires for EO 511, include the information that the hazard is faced by inspectors entering external sites not under the control of their agency. This also may require additional information in other sections of the document. For example:

- Policy – Is there a policy on what the inspector should do if there are serious hazards present at an external site, and the inspector does not have the means to proceed safely?
- Training – inspectors may receive more comprehensive hazard awareness and assessment training so they can evaluate conditions at external sites and make decisions relative to their own safety.
- Administrative controls – are there any methods used to evaluate hazards and needed protections prior to the inspection? For example, requesting information or contacting the other employer in advance to review hazards and address safety procedures, requesting a safety escort at the site, use of other sources of information.
- Safety equipment and personal protective equipment controls – if inspectors need any safety or personal protective equipment, report whether inspectors are provided with their own equipment to bring with them, or if they rely on the employer at the inspection site to provide this equipment.

In the “gap analysis” summary for each hazard, list any specific “gaps” in any of the needed protections that are specific to inspectors. For example, there is no method to ensure that the other employer will provide adequate protective equipment, or the need to conduct an unannounced inspection will eliminate the possibility of advance contact, or inspectors do not receive adequate training to recognize and assess hazards faced at external sites.

If the agency is struggling in general with how to protect their employees who are conducting inspections at external sites, that is useful information that should be provided

to the Advisory Committee so this issue can be addressed on a large scale. This information can be provided in the general comments section on any of the individual gap analysis summary sheets or in the gap analysis overview document.