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**Allied Universal  
Corporate Safety Manual**



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## Allied Universal Corporate Safety Manual

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Executive Approval:   
Signature

CARLOS BLACKWOOD  
Print

5/16/2019  
Date

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# Management Commitment

## Tab 01

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### OUR MISSION

Promote and support a corporate culture of safety through policies and practices that emphasize personal safety so as to protect Allied Universal employees from workplace injuries and elevate the level of service to Allied Universal's clients.

### OUR GUIDING BEHAVIORS

In order to achieve our mission, we must:

- Foster a culture in which safety is a primary concern of executive, regional, branch and site leadership as well as each and every security professional.
- Provide a comprehensive safety manual to protect the occupational health and safety of our people.
- Work to continuously evaluate and improve our safety policies, programs, initiatives and performance.
- Constantly promote safety and health awareness in all of our people.
- Cultivate and support frequent safety communications via manager interactions, safety committees, personnel training, the safety manual and various other communication methods.
- Assess job tasks and document safety measures for all posts via the Job Safety Analysis, and train all personnel on the content of the JSAs for their assignments.
- Anticipate and proactively prepare for emerging new hazards and risks.
- Recognize excellent safety performance among our personnel.
- Hold our personnel accountable to behave in accordance with the requirements and spirit of the safety manual.
- Preserve and enhance our corporate reputation in the community as a safe and healthy workplace and business partner.

### OUR COMMITMENT

This corporate safety manual is issued for implementation throughout Allied Universal.

# Injury Illness Prevention Plan

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### **PURPOSE**

To establish procedures that will assist management in maintaining a safe and healthy work environment for all Allied Universal employees.

### **SCOPE**

This Plan outlines the elements of Allied Universal safety and health Plan. These elements include management and employee responsibilities, Plan compliance, internal communications, hazard assessment and correction, incident investigation, safety training and record keeping.

### **APPLICATION**

This Plan applies to all Allied Universal offices and personnel. The requirements of this Plan are based on the Federal OSHA General Duty Clause; 29 CFR 1910, and 8 CCR 3203.

### **Allied Universal Safety Policy**

It is the policy of Allied Universal and its subsidiaries to work continually toward improving our safety expectations, process and procedures with the goal of evolving our safety culture.

It is Allied Universal's intent to provide a safe working environment in all areas, for all employees. Accidents and injuries are prevented by proactively controlling the work environment and the actions of employees. Therefore, safety will take precedence in all areas of our business operations practices through the evaluation, planning and execution of injury prevention measures at all client sites. Every attempt will be made to reduce the possibility of accident occurrence. Protection of employees, the public, and company property and operations is paramount. We consider no phase of our operations more important than the health and safety of our employees.

Safe work and safe driving practices on the part of the employees must be part of all operations at our client sites. Employees must understand their personal responsibility for the prevention of injuries and be held accountable for working in a safe manner. Management teams shall embrace safety as a core value and do everything in their power to prevent injuries. Accident prevention and efficient service go hand in hand. Allied Universal maintains that all workplace injuries can and should be prevented. Allied Universal's (AU) Injury and Illness Prevention Plan ("IIPP") sets the expectations for safety across all AU service lines. Management and our Service Line operations teams will continue to be guided and motivated by this policy and with the cooperation of all employees, will actively pursue a safer working environment.

(Chief Executive Officer): \_\_\_\_\_



Date: 4/15/19

# Injury Illness Prevention Plan

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### RESPONSIBILITIES

The Injury and Illness Prevention Plan (IIPP) administrator will be the Vice President of Risk Management, who has the authority and responsibility for implementing the provisions of this Plan for Allied Universal. Local branch management will have the overall responsibility for implementing and maintaining this Plan at their respective site or location. All managers and supervisors are responsible for implementing the IIPP in their work areas and for answering employee questions about the IIPP. A copy of this IIPP shall be made available for review by all Allied Universal employees.

### MANAGEMENT

Local management is responsible for implementing Allied Universal safety policies at their locations. Following are key responsibilities for effective management of the safety Plan:

- Assess the work environment and work tasks, using the Job Safety Analysis process, to make the job safe through removing hazards, developing safe work practices, and/or using protective equipment.
- Motivation, education and training of supervisory personnel on company safety policies and Plans, and indoctrination of a safety philosophy in each site.
- Maintain open communications in regard to safety with all supervisory personnel / employees.
- Provide full support to supervisors in implementing corporate safety Plans at the site level.
- Analyze injury trends and provide direction on injury prevention.
- Periodically audit safety Plans and inspect facilities to maintain compliance with corporate mandates.
- Recognize and reward, where appropriate, individual employee safety performance.
- Coordinate activities of loss control consultants to maximize efforts in hazard evaluation and control.
- Review all new posts and equipment for compliance with applicable federal, state and local codes prior to placing an employee in the area.
- Formulate, install and administer effective accident prevention Plans, techniques and procedures.
- Coordinate local participation in company-wide accident prevention Plans and analyze effectiveness

### SUPERVISORS

The site supervisor is the employees' direct link to management and it is important that they display to the employee enthusiasm and pride in the safety Plan. The primary safety goal of the supervisor is to lead the workplace accident prevention effort. The unique closeness to the line employee requires that the supervisor do the following safety-related tasks:

- Develop a Job Safety Analyses for each post (see Job Safety Analysis manual tab) and instruct employees in safe work practices.
- Enforce safety rules, regulations and requirements.
- Implement safety Plans and procedures to meet the needs of the workplace.
- Actively participate in and direct the planning of accident prevention Plans.
- Demonstrate support of the safety Plan through personal participation.

# Injury Illness Prevention Plan

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- Recognize and reward where appropriate individual employee safety performance.
- Initiate and conduct incident investigations.
- Conduct safety training as needed and detailed throughout the safety manual.
- Identify and correct unsafe acts and conditions through Supervisor and Employee Safety Observations.
- Arrange for first aid and medical treatment when necessary.
- Report safety-related items that cannot be readily dealt with to the proper management authority.

### **EMPLOYEES**

Employees have responsibilities that relate to the safe operation of the workplace and should be aware of them at all times. These responsibilities include:

- Perform job duties in a manner which enhances their personal safety and health as well as the safety and health of others.
- Follow all established safe work practices related to their job.
- Become familiar with company safety and health rules and regulations and adhere strictly to them.
- Immediately discontinue work and alert supervisors in the event they discover an unsafe work practice or situation.
- Immediately report all injuries, illnesses, and near misses to their supervisor.
- Properly use all personal protective equipment issued to them and immediately report any complications which may hinder the effectiveness of the equipment to their supervisor.

### **COMPLIANCE**

Management is responsible to clearly communicate all safety and health policies and procedures to all employees. Managers and supervisors are expected to enforce the rules fairly and uniformly.

Employees are responsible for following safe work practices, all directives, policies, procedures and for assisting in maintaining a safe work environment. The Allied Universal system of compliance with these practices includes the following:

- Informing employees of the provisions of our Injury and Illness Prevention Plan.
- Evaluating the safety performance of all workers.
- Recognizing employees who perform their job duties using safe work practices.
- Providing additional training to workers whose safety performance is deficient.
- Disciplining workers for failure to comply with safe work practices and established safety regulations.

### **COMMUNICATION**

Allied Universal recognizes that open, two-way communication between management and employees on safety and health related issues is essential to foster a safe and productive workplace. The following system of communication is designed to facilitate a continuous flow of safety and health information between management and staff in a form that is readily understandable. This will be accomplished through:

# Injury Illness Prevention Plan

## Tab 02

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- New worker orientation including a review of task-specific Job Safety Analysis and discussion of safety and health policies and procedures.
- Periodic review of the IIPP.
- Workplace safety and health training Plans.
- Regularly scheduled safety meetings.
- Effective communication of safety and health concerns between workers and supervisors.
- Requests for and responses to all safety improvement suggestions/requests by employees to management.
- Posted or distributed safety information.
- A workplace hazard reporting Plan.

**Appendix 2.1** to this policy is a resource available to Supervisors and Managers to communicate the elements of the Injury & Illness Prevention Plan to employees. This summary can be utilized as a bulletin board posting, read file document, or handout to employees.

Employees with safety concerns can communicate with their site supervisor/manager, local Human Resource representative or send safety questions/concerns to [safety@aus.com](mailto:safety@aus.com). If further support is needed employees can also call **Allied Universal Employees First at 1-800-461-4330 in the United States, or at +1-720-514-4400 outside of the United States**, or make an anonymous report online at <http://employeesfirst.aus.com> if at any time when they:

- Do not feel comfortable contacting the designated supervisor;
- Do not feel your concern was appropriately addressed;
- Do not have the contact information for the appropriate person;
- Have not received a response to your concern within 10 business days.

Employees can make this call 24 hours a day, 7 days a week anonymously; however, providing a name will allow a more direct and personal response. The sole purpose of the Hotline is to get the concern to the appropriate person so that the issue can promptly be resolved.

Nothing in this manual prohibits employees from reporting possible violations of federal, state or local law or regulation to any government agency or entity and any agency inspector general, or making other disclosures that are protected under the whistleblower provisions of federal, state or local law or regulation. While Employees are encouraged to bring any such possible violation to the attention of Allied Universal. Employees do not need the prior authorization of Allied Universal to make any such reports or disclosures to these entities.

### HAZARD ASSESSMENT

Upon initial start-up of a site/account the Job Safety Analysis process will be completed by the site manager to identify and mitigate conditions which could pose a hazard to employees. Managers are encouraged to include supervisors and/or security professionals in this process. In addition, inspections will occur in the following instances:

- When new substances, procedures, or equipment which present new hazards are introduced.
- When previously unrecognized hazards are discovered.



# Injury Illness Prevention Plan

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- Following an injury event.

Additionally, a Job Safety Analysis will be completed for each post upon initial start-up and at least annually thereafter. Refer to the Job Safety Analysis tab of the safety manual for further information.

### **HAZARD CORRECTION**

When hazards are identified in the workplace the manager is responsible to take action or coordinate efforts with the client to eliminate, reduce, guard, or restrict employee access to the hazard to protect employees from injury. Actions taken to eliminate, reduce, or guard hazards will be taken in compliance with post orders and contract specifications.

When the hazard is a danger to employees, all but those necessary to abate the hazard shall be removed beyond the limits of exposure to the hazard. Those who are selected to abate the hazard shall be equipped with the proper safety equipment and training before performing such work tasks. All corrective actions taken and the dates of those actions shall be properly documented and retained on file.

### **INCIDENT INVESTIGATIONS**

Learning from past incidents, and applying corrective actions, is an important part of the Allied Universal IIPP. Investigations will be completed as described in the Incident Reporting and Response tab of this manual. Types of incidents to be investigated and documented include:

- Incidents involving work-related injuries and/or illnesses
- Automobile accidents
- Near miss events

### **TRAINING AND INSTRUCTION**

All employees, including managers and supervisors, shall have training and instruction on general as well as job specific safety and health related procedures and policies. This training and instruction shall be provided to employees in the following situations:

- When the IIPP is first established.
- When newly hired.
- When reassigned to a post or task for which they have not received prior formal training.
- Whenever new substances, procedures or equipment are introduced that present a hazard which is new to the post or job task.
- Whenever the employer is made aware of a new or previously unrecognized hazard.
- To all supervisors to familiarize them with the hazards under which their employees work.
- To all workers with respect to specific hazards of their job task.
- To employees who are observed performing an unsafe act or who are injured during the commitment of an unsafe act.

# Injury Illness Prevention Plan

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### RECOGNITION AND DISCIPLINARY POLICY

#### **Recognition:**

Allied Universal employees are recognized for working safely, following safety rules, and identifying safety hazards. Each site will establish a system for recognizing employees who perform their jobs in a safe manner and follow established safe work practices and safety regulations. All employees are encouraged to submit ideas that could make work processes in the company safer. Local management reviews each idea submitted to insure that the idea is practical and will actually reduce hazards.

#### **Discipline:**

Employees will be disciplined for noncompliance or disregard of safety regulations or safe work practices up to and including termination.

### RECORDKEEPING

Allied Universal has taken steps to document certain aspects of its Injury and Illness Prevention Plan. Items that must be documented include:

1. All employee safety training is documented using WinTeam. Training areas that are documented include:
  - New employee orientation, including on-the-job training
  - Required topic-specific safety training of affected employees
  - Monthly supervisor safety talks
  - JSA Acknowledgement
2. All inspection records and training documents shall be kept current and on file for no less than five years.
3. Employee medical records are retained and available to employees, as detailed in Tab 17 – Access to Medical and Exposure Records.
4. All employee injuries/illnesses are documented via an electronic system, as detailed in Tab 18 – OSHA Recordkeeping.

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### INJURY AND ILLNESS PREVENTION PLAN - APPENDIX 2.1

*This is a summary of the Plan; complete Plan is located in your post orders.*

**Policy Statement** – It is the policy of Allied Universal to provide safe and healthful working conditions for all employees and to establish and implement safety procedures and regulations to maintain safe working conditions.

**Compliance** – Management and employees are responsible for following safe work practices. Training will be provided to all employees and additional training will be provided where safety performance is deficient. Employees will be disciplined for failure to follow established safe work practices and safety regulations.

**Communication** – Management is responsible for communicating with all employees about occupational safety and health issues. Security professionals are expected and encouraged to inform their supervisors about workplace hazards without fear of reprisal. Communication will be conducted through periodic meetings, postings, distributed materials, and informal discussions.

**Hazard Assessment** – Inspections to identify and evaluate workplace hazards shall be performed at least monthly. Site specific self-inspection checklists should be developed.

**Accident/Exposure Investigation** – Procedures for investigating workplace incidents and accidents have been established. All investigations shall be reviewed and evaluated to prevent future incidents.

**Hazard Correction** – Unsafe or unhealthy work conditions, practices or procedures shall be corrected in a timely manner based on the severity of the hazards. If serious hazards cannot be corrected when observed or discovered, workers will be removed from the area until the hazard can be corrected.

**Training and Instruction** – All employees, including managers and supervisors, shall receive training and instruction on general and job-specific safety and health practices. Employees training will include instruction about how to report safety hazards, incidents and suggestions.

**Recognition** – Management is responsible to hold employees accountable for their performance. This includes a balance of recognizing safe behavior and suggestions for safety improvements.

# Safety Orientation

## Tab 03

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### **PURPOSE**

The purpose of the Safety Orientation program is to provide general guidelines and training requirements for all new Allied Universal security professionals and supervisors. This program will also apply to existing employees assigned to a new site or post.

### **SCOPE**

The most effective way to help our employees to do their jobs safely and productively is to supply them with complete and accurate safety information on their first day. All employees shall be provided a safety orientation by their supervisor before they begin work. The Employee Safety Orientation Checklist (Appendix 3.1) is used to outline the required content and to document the orientation process.

### **RESPONSIBILITIES**

Managers are responsible for implementation of the policy and the quality of the orientation process.

Managers or supervisors are responsible to perform the safety orientation as described in this policy for all new-hire and transfer employees.

Employees are responsible for participating in the training process and asking questions so they fully understand the safety rules and procedures.

Managers are responsible for ensuring completion is entered into WinTeam.

### **ORIENTATION PROCEDURE**

Employees will be provided with the following documents as part of the Safety Orientation process:

- Injury And Illness Prevention Program Summary (Appendix 2.1 of the IIPP manual section)
- Heat and Illness Prevention Program
- Hazard Communication and GHS Chemical Safety Program
- Job Safety Analysis (JSA) for their job task(s)
- Site-specific safety rules for the location they are assigned
- The Safety Manual will be available for reference during the orientation.
- Location of Online Orientation information

Supervisors will sit down with the employee to review and discuss each item in detail, specifically addressing how each section above applies to the employees' work duties and the site. After each item has been reviewed and the employee understands his/her responsibilities, both the employee and the training supervisor will initial that item on the Employee Safety Orientation Checklist (Appendix 3.1). Do not move on unless the employee understands the item.

### **INJURY AND ILLNESS PREVENTION PLAN SUMMARY**

The supervisor will review this summary (Appendix 2.1) with the security professional to discuss how it is applied at the work site, and answer any questions from the security professional. Our Injury and Illness Prevention Plan (IIPP) is a basic written workplace safety program. Our IIPP was designed to improve the safety and health in our workplace.

# Safety Orientation

## Tab 03

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The Injury and Illness Prevention Program 8 required elements are:

1. Responsibility
2. Compliance
3. Communication
4. Hazard Assessment
5. Accident/Exposure Investigation
6. Hazard Correction
7. Training and Instruction
8. Recordkeeping

### HEAT ILLNESS PREVENTION PLAN

Our company has developed a written procedure to implement effective procedures to avoid risks associated with Heat. The Heat Illness Prevention Plan includes the following:

- Procedures for providing sufficient water
- Procedures for providing access to shade
- High-heat procedures
- Emergency response procedures
- Acclimatization methods and procedures

### HAZARD COMMUNICATION AND THE GLOBALLY HARMONIZED SYSTEM (GHS)

Our company complies with the new Cal/OSHA Hazard Communication Standard (HCS) to align with the Globally Harmonized System (GHS) of classification and labeling of chemicals. The key changes in the Hazard Communication Standard affect both chemical suppliers (manufacturers, importers, distributors) and employers whose employees may be exposed to hazardous chemicals.

The revision to the HCS requires suppliers to use the same classification criteria for each type of health and physical hazard as required by GHS. For further details, reference Tab 11 – Hazard Communication section of the corporate Safety Manual and the site-specific hazard communication program.

### SAFETY DATA SHEETS FORMAT

Safety data sheets (SDS) have now replaced material safety datasheets (MSDS). Suppliers now must prepare safety data sheets for their products that follow a standardized 16-section format in conveying information about a hazardous chemical's health effects and physical and chemical characteristics.

There are 16 standardized sections to each SDS. Employees will be provided training on the chemicals to which they may be exposed and this training will include a review of applicable SDS.

All the information you will need to work safely with any chemical will be provided by your supervisor, consistent with all other policies, the written document is available to any employee for their review.

# Safety Orientation

## Tab 03

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### **JOB SAFETY ANALYSIS (JSA)**

The supervisor will conduct a 'walk through' of the job tasks with the security professional while reviewing the JSA. For each job task the supervisor will thoroughly explain the potential hazards, safe job procedure, and required personal protective equipment for each job step. The JSA documents each basic step of the job, potential hazards and safety measures to reduce the risk of injury or loss. Prevention of costly workplace injuries and illnesses begins with identifying hazards. JSA is one practical approach recommended to identify hazards and possible solutions to reduce or eliminate hazards. JSAs focus on hazard identification at the job task level. When conducting a JSA, always consider the full range of safety and health hazards.

The JSA process, detailed in Tab 5 of the Corporate Safety Manual, may be used at workplaces to identify potential noise, atmospheric contaminants, or musculoskeletal risk factors; however, in-depth evaluation of worker exposures using special equipment and procedures is often necessary to do before you complete JSAs entries.

### **BLOODBORNE PATHOGENS (BBP)**

The supervisor will review with all security professionals awareness-level training on the company BBP policy and practice in order to always practice universal precautions.

### **ALLIED UNIVERSAL SAFETY MANUAL**

The supervisor will review all safety manual sections which apply to the security professional's work duties.

### **SITE-SPECIFIC SAFETY RULES**

The supervisor will review all additional site-specific rules with the new employee.

### **RECORDKEEPING**

The employee will initial and date each of the items on the Employee Safety Orientation Checklist (Appendix 3.1) as they are reviewed. Once all items are initialed/dated and all of the employee's questions have been answered, both the employee and the training supervisor will sign the form. Completion must be entered into WinTeam using the code: Safety Orientation and then filed.

All safety training documentation shall be maintained for a minimum of (5) years.

# Safety Orientation

## Tab 03

### APPENDIX 3.1

#### EMPLOYEE SAFETY ORIENTATION CHECKLIST

Name: \_\_\_\_\_ Employee ID: \_\_\_\_\_ Job #: \_\_\_\_\_  
 Date: \_\_\_\_\_

Each employee **MUST UNDERSTAND** that working in a **SAFE MANNER** is a **JOB REQUIREMENT** and **EXPECTED**. **Short cuts, unsafe acts or work practices will NOT be tolerated.**

	Employee Initials/Date
1. <b>Review in detail the current Job Safety Analysis for each assigned job post.</b>	1 ____/____
2. Review the Injury Illness Prevention Plan.	2 ____/____
3. Review, understand and observe all safety rules as written in the post orders, the Allied Universal Safety Manual, and client requirements.	3 ____/____
4. Complete safety trainings as required** by assigned work tasks, which may include (list N/A if <i>not</i> an assigned work task):	4a ____/____
a) Defensive Driving,	4b ____/____
b) Specialized Patrol Vehicles,	4c ____/____
c) Chemical Hazard Communication,	4d ____/____
d) Personal Protective Equipment,	4e ____/____
e) Bloodborne Pathogens	4f ____/____
f) Heat Illness	4g ____/____
g) Other: _____	5 ____/____
5. Review how to report any unsafe condition or safety concern to your supervisor/manager.	6 ____/____
6. All/any injury, near miss or vehicle accident must be reported immediately (during the shift in which it occurred) to the supervisor/manager. Review how to report incidents and how to get First Aid or medical care when needed.	

\*\* This is not a complete list of safety training topics; additional training topics may apply to the assigned job.

Any person who makes or causes to be made and knowingly false or fraudulent material statement or material representation for the purpose of obtaining or denying workers' compensation benefits or payments will be discharged and reported to the Workers' Compensation Insurance Commission. I understand that it is my responsibility to review and adhere to these policies. Any questions will be discussed with the supervisor.

\_\_\_\_\_/\_\_\_\_\_/\_\_\_\_\_ / \_\_\_\_\_/\_\_\_\_\_/\_\_\_\_\_

Employee Signature / Print Name

Supervisor Signature / Print Name

Enter the completion into WinTeam using the code: **Safety Orientation** and then place in the employee's file.

# Safety Training

## Tab 04

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### PURPOSE

Employee safety training is critical to the success of Allied Universal's Injury and Illness Prevention Program. The federal Occupational Safety and Health Administration (OSHA) regulations require all employers to provide specific safety and health training to their employees. This section will provide guidelines and information on the various safety and health training topics required by OSHA.

### SCOPE

This section outlines OSHA training requirements by; (1) Identifying the training topic, (2) Citing the OSHA standard, (3) General training content, (4) Identifying who will be trained, (5) Identifying training intervals.

### APPLICATION

This section applies to all Allied Universal employees. The requirement for this training is based on federal OSHA regulations found in 29 CFR 1910, 29 CFR 1904, 8 CCR, or other State OSHA requirements.

### OSHA REQUIRED TRAINING

Training shall be conducted for all affected employees in accordance with the requirements listed in Appendix 4.1.

Supervisors are responsible to evaluate the safety and health hazards to which workers under their immediate direction may be exposed, using the Job Safety Analysis process, as detailed in Tab 5 of the safety manual. The results of this evaluation will be used to determine which training elements are needed with respect to the hazards specific to job assignments. Required training elements will be documented in the post-specific Job Safety Analysis (Appendix 5.1).

In accordance with the Injury Illness Prevention Plan, Supervisors will review Appendix 2.1 and 5.1 and will update the documents as needed, including updates to the training requirements, when:

- new substances, processes, procedures or equipment are introduced to the workplace and represent a new hazard.
- Allied Universal management is made aware of a new or unrecognized hazard.
- employees given new job assignments, upon hire or upon transfer to a new position.

Aside from orientation training, most safety training is to be provided at regular safety meetings or at scheduled training sessions. Training requirements vary by state and local jurisdiction; some states have their own OSHA regulations that exceed federal OSHA requirements. Consult the individual state regulations for more details. These states are as follows:

Alaska	Kentucky	Puerto Rico	Washington
Arizona	Maryland	South Carolina	Wyoming
California	Minnesota	Tennessee	
Hawaii	North Carolina	Utah	
Indiana	Nevada	Vermont	
Iowa	Oregon	Virginia	



# Safety Training

## Tab 04

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The Summary of OSHA Regulatory Training Requirements (Appendix 4.1) lists general safety and health training requirements. Clients may require additional safety and health training be provided to address site specific requirements.

### TRAINING INTERVALS

Safety training will be provided at specific intervals. Those intervals are included in Appendix 4.1 and defined below.

- **Time of Hire:**  
Training is provided for employees when first hired by Allied Universal, or when re-hired following a layoff or other leave-of-absence that exceeds 30 days.
- **Upon Assignment:**  
Training is provided for employees when they are assigned to a specific post or job task.
- **Annually:**  
Training is provided for employees within 12 months of the previous training date.
- **Work Changes:**  
Training is provided for employees when a new hazard has been introduced/ identified or a changes are made to the equipment or process used to perform their work.
- **Noncompliance:**  
Training is provided for an employee when they disregards or fail to comply with established procedures. Noncompliance training may also be provided to a group of employees when lack of understanding or an increase in related incidents is observed.

### RECORDKEEPING

All safety and health training must be documented and retained for a minimum of five (5) years.

# Safety Training

## Tab 04

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### SUMMARY OF OSHA REGULATORY TRAINING REQUIREMENTS - APPENDIX 4.1

#### INDEX

Page #	Source	Title
2	1910.38	Emergency Action Plans and Fire Prevention Plans
2	1910.66	Powered Platforms
3	1910.95	Occupational Noise Exposure
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4	1910.134	Respiratory Protection
4	1910.145	Accident Prevention Signs and Tags
5	1910.146	Permit Required Confined Spaces
6	1910.147	Lock-out Tag-out: Control of Hazardous Energy
6	1910.157	Portable Fire Extinguishers – Available for use
6	1910.157	Portable Fire Extinguishers – Assigned use
6	1910.156	Fire Brigades
7	1910.178	Powered Industrial Trucks
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9	1910.1025	Lead
9	1910.1028	Benzene
9	1910.1030	Bloodborne Pathogens
10	1910.1200	Hazard Communication
10	CA 8:3395	Heat Illness Prevention
12	osha.gov	State Occupational Safety and Health Plans

# Safety Training - Tab 04

The following training requirements are summarized from Title 29, Code of Federal Regulations Part 1910.

Appendix 4.1		Frequency of Training					Special Notes
		A. Time of Hire			D. Work Changes		
		B. Upon Assignment			E. Non-compliance		
		C. Annually					
Title & Regulation	Required Audience & Elements	A	B	C	D	E	
<b>Emergency Action Plans and Fire Prevention Plans</b>  OSHA 1910.38(a)(5)	All employees shall be trained on the following:  Review of written plans detailing employee responsibilities and those parts that the employee must know to protect the employee in the event of an emergency.	X		X	X		
<b>Powered Platforms</b>  OSHA 1910.66(i)	All employees who operate working platforms shall be trained on the following: <ul style="list-style-type: none"> <li>• Recognition of, and preventive measures for, the safety hazards associated with their individual work tasks.</li> <li>• General recognition and prevention of safety hazards associated with the use of working platforms, including the provisions in the section relating to the particular working platform to be operated.</li> <li>• Emergency action plan procedures required in paragraph (e)(9) of this section.</li> <li>• Work procedures required in paragraph (i)(1)(iv) of this section.</li> <li>• Personal fall arrest system inspection, care, use and system performance.</li> <li>• OSHA's Appendix C: Section I is mandatory; Sections II and III are non-mandatory</li> </ul>		X				Training of employees in the operation and inspection of working platforms shall be done <b>by a competent person</b> .  Written work procedures for the operation, safe use and inspection of working platforms shall be provided for employee training. Pictorial methods of instruction, may be used, in lieu of written work procedures, if employee communication is improved using this method. The operating manuals supplied by manufacturers for platform system components can serve as the basis for these procedures.  The employer shall certify that employees have been trained in operating and inspecting a working platform by preparing a certification record which includes the identity of the person trained, the signature of the employer or the person who conducted the training and the date that training was completed. The certification record shall be prepared at the completion of the training required in paragraph (i)(1)(ii) of this section, and shall be maintained in a file for the duration of the employee's employment. The certification record shall be kept readily available for review by the Assistant Secretary of Labor or the Assistant Secretary's representative.
<b>Occupational Noise Exposure (Hearing Conservation)</b>	Employees exposed to high-noise environments and/or all those in a hearing protection plan shall be trained on the following:		X	X			A copy of the OSHA standard 29 CFR 1910.95 shall be available during training

# Safety Training - Tab 04

The following training requirements are summarized from Title 29, Code of Federal Regulations Part 1910.

Appendix 4.1		Frequency of Training					Special Notes
		A. Time of Hire			D. Work Changes		
		B. Upon Assignment			E. Non-compliance		
		C. Annually					
Title & Regulation	Required Audience & Elements	A	B	C	D	E	
OSHA 1910.95(i)(4) and (k)(1-3)	<ul style="list-style-type: none"> <li>The effects of noise on hearing</li> <li>The purpose of hearing protectors, the advantages, disadvantages, and attenuation of various types, and instructions on selection, fitting, use, and care</li> <li>The purpose of audiometric testing, and an explanation of the test procedures</li> </ul>						
<b>Personal Protective Equipment (PPE)</b>  OSHA 1910.132(f)	Each employee who is required to wear PPE shall be trained on the following: <ul style="list-style-type: none"> <li>When PPE is necessary</li> <li>What PPE is necessary</li> <li>How to properly don, doff, adjust and wear PPE</li> <li>The limitations of PPE</li> <li>The proper care, maintenance, useful life, and disposal of the PPE.</li> </ul>		X		X	X	Each affected employee shall <b>demonstrate an understanding</b> of the training and the ability to use PPE properly before being allowed to perform work requiring the use of PPE.  When the employer has reason to believe that any affected employee who has already been trained does not have the understanding and skill required, the employer shall retrain each such employee: <ul style="list-style-type: none"> <li>Changes in the workplace</li> <li>Changes in the types of PPE</li> <li>Inadequacies of employee's knowledge or use</li> </ul> A written certification showing that the employee understood the training, and containing the name(s) of the employee(s) trained, the date of training and the course titles is required.
<b>Respiratory Protection</b>  OSHA 1910.134(k)	All affected employees shall be trained on the following: <ul style="list-style-type: none"> <li>Why the respirator is necessary and how improper fit, usage, or maintenance can compromise the protective effect of the respirator</li> <li>The limitations and capabilities of the respirator</li> <li>How to use the respirator effectively in emergency situations, including situations when the respirator malfunctions</li> </ul>		X	X	X	X	Employee must <b>demonstrate knowledge</b> of these elements.  Employee must undergo medical clearance and fit testing prior to use of most types of respirators.

# Safety Training - Tab 04

The following training requirements are summarized from Title 29, Code of Federal Regulations Part 1910.

Appendix 4.1		Frequency of Training					Special Notes
		A. Time of Hire			D. Work Changes		
		B. Upon Assignment			E. Non-compliance		
		C. Annually					
Title & Regulation	Required Audience & Elements	A	B	C	D	E	
	<ul style="list-style-type: none"> <li>How to inspect, put on and remove, use, and check the seals of the respirator</li> <li>What the procedures are for maintenance and storage of the respirator</li> <li>How to recognize medical signs and symptoms that may limit or prevent the effective use of respirators</li> <li>And the general requirements of the standard</li> </ul>						
<b>Accident Prevention Signs and Tags</b>  OSHA 1910.145(c)	All affected employees shall be trained on the following: <ul style="list-style-type: none"> <li>All employees shall be instructed that danger signs indicate immediate danger and that special precautions are necessary</li> <li>All employees shall be instructed that caution signs indicate a possible hazard against which proper precautions should be taken</li> </ul>	X					
<b>Permit Required Confined Spaces</b>  OSHA 1910.146(g)	All affected employees shall be trained on the following to establish employee proficiency in the duties required by this section and shall introduce new or revised procedures, as necessary, for compliance with this section: <ul style="list-style-type: none"> <li>Know the hazards that may be faced during entry, including information on the mode, signs or symptoms &amp; consequences of exposure.</li> <li>Proper use of equipment.</li> <li>Communicate with the attendant for monitoring or to alert of the need to evacuate the space.</li> <li>When to quickly exit the space.</li> </ul>		X		X	X	The training shall <b>establish employee proficiency</b> in the duties required by this section  The employer shall certify that the training required by this section has been accomplished, and shall contain each employee's name, the signatures or initials of the trainers, and the dates of training.  *** Each member of the rescue service shall be trained in basic first-aid and CPR.

# Safety Training - Tab 04

The following training requirements are summarized from Title 29, Code of Federal Regulations Part 1910.

Appendix 4.1		Frequency of Training					Special Notes
		A. Time of Hire			D. Work Changes		
		B. Upon Assignment			E. Non-compliance		
		C. Annually					
Title & Regulation	Required Audience & Elements	A	B	C	D	E	
	<p>*** The following requirements apply where employees enter permit spaces to <b>perform rescue services</b>:</p> <ul style="list-style-type: none"> <li>The employer shall ensure that each member of the rescue service is provided with, and is trained to use properly, the PPE and rescue equipment necessary for making rescues from permit required confined spaces.</li> <li>Each member of the rescue service shall be trained to perform the assigned rescue duties. Each member of the rescue service shall also receive the training required of authorized entrants under paragraph (g) of this section.</li> <li>Each member of the rescue service shall practice making permit space rescues at least once every 12 months, by means of simulated rescue operations in which they remove dummies, mannequins, or actual persons from the actual permit spaces or from representative permit spaces. Representative permit spaces shall, with respect to opening size configuration, and accessibility, simulate the types of permit spaces from which the rescue is performed.</li> <li>Each member of the rescue service shall be trained in basic first-aid and CPR. At least one member of the rescue service holding current certification in first-aid and in CPR shall be available.</li> </ul>						

# Safety Training - Tab 04

The following training requirements are summarized from Title 29, Code of Federal Regulations Part 1910.

Appendix 4.1		Frequency of Training					Special Notes
		A. Time of Hire			D. Work Changes		
		B. Upon Assignment			E. Non-compliance		
		C. Annually					
Title & Regulation	Required Audience & Elements	A	B	C	D	E	
<b>Lock-out Tag-out: Control of Hazardous Energy</b>  OSHA 1910.147(c)(7)	Each affected employee shall be instructed in the purpose and use of the energy control procedure.  All other employees whose work operations are or may be in an area where energy control procedures may be utilized, shall be instructed about the procedure, and about the prohibition relating to attempts to restart or reenergize machines or equipment which are locked out or tagged out.		X		X	X	Training documentation shall: <ul style="list-style-type: none"> <li>• <b>Establish employee proficiency</b></li> <li>• Certify that the employee has been trained and is being kept up to date</li> <li>• Include the employee's name and dates of training</li> </ul>
<b>Portable Fire Extinguishers – AVAILABLE FOR USE</b>  OSHA 1910.157(g)	All employees who have fire extinguishers <b>available for use</b> shall be trained on the following: The employer shall also provide an educational program to familiarize employees with the general principles of fire extinguisher use and the hazards involved with incipient stage firefighting.		X	X			Education means the process of imparting knowledge or skill through systematic instruction. It does not require formal classroom instruction.
<b>Portable Fire Extinguishers – ASSIGNED USE</b>  OSHA 1910.157(g)	All employees who are <b>assigned duties</b> to use a fire extinguishers shall be trained on the following: The employer shall provide assigned employees with training in the use of appropriate equipment.		X	X			Training means the process of making proficient <b>through instruction AND hands-on practice</b> in the operation of equipment, including respiratory protection equipment, that is expected to be used in the performance of assigned duties.
<b>Fire Brigades</b>  OSHA 1910.156(c)	Training shall be commensurate with the duties and functions the fire brigade members are expected to perform. <ul style="list-style-type: none"> <li>• Inform about special hazards such as storage and use of flammable liquids and gases, toxic chemicals, radioactive sources, and water reactive substances, to which they may be exposed during fire and other emergencies.</li> <li>• Inform about any changes that occur in relation to the special hazards</li> <li>• Review of written procedures that describe the actions to be</li> </ul>		X	X			Fire brigade leaders and training instructors shall be provided with training and education which is more comprehensive than that provided to the general membership of the fire brigade.  Training shall be conducted frequently enough to assure that each member of the fire brigade is able to perform the assigned duties and functions satisfactorily and in a safe manner.  Members who are expected to perform interior structural firefighting shall be provided with an education session or training at least quarterly.

# Safety Training - Tab 04

The following training requirements are summarized from Title 29, Code of Federal Regulations Part 1910.

Appendix 4.1		Frequency of Training					Special Notes
		A. Time of Hire			D. Work Changes		
		B. Upon Assignment			E. Non-compliance		
		C. Annually					
Title & Regulation	Required Audience & Elements	A	B	C	D	E	
	taken in situations involving the special hazards						
<b>Powered Industrial Trucks</b>  OSHA 1910.178 (l)	Powered industrial truck operators shall receive initial training in the following topics, except in topics which the employer can demonstrate are not applicable to safe operation of the truck in the employer's workplace:  Truck-related topics: <ul style="list-style-type: none"> <li>• Operating instructions, warnings, and precautions for the types of truck the operator will be authorized to operate;</li> <li>• Differences between the truck and the automobile;</li> <li>• Truck controls and instrumentation: where they are located, what they do, and how they work;</li> <li>• Engine or motor operation;</li> <li>• Steering and maneuvering;</li> <li>• Visibility (including restrictions due to loading);</li> <li>• Fork and attachment adaptation, operation, and use limitations;</li> <li>• Vehicle capacity;</li> <li>• Vehicle stability;</li> <li>• Any vehicle inspection and maintenance that the operator will be required to perform;</li> <li>• Refueling and/or charging and recharging of batteries;</li> <li>• Operating limitations;</li> <li>• Any other operating instructions, warnings, or precautions listed in the operator's manual for the types of vehicle that the employee is being trained to operate.</li> </ul> Workplace-related topics:		X		X	X	Training shall consist of a combination of formal instruction (e.g., lecture, discussion, interactive computer learning, video tape, 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.  All operator <b>training and evaluation</b> shall be conducted by persons who have the knowledge, training, and experience to train powered industrial truck operators and evaluate their competence.  <b>An evaluation of each powered industrial truck operator's performance shall be conducted at least once <u>every three years</u>.</b>  The employer shall certify that each operator has been trained and evaluated as required by this paragraph (l). The certification shall include the name of the operator, the date of the training, the date of the evaluation, and the identity of the person(s) performing the training or evaluation.  <b>Refresher training</b> in relevant topics shall be provided to the operator when: <ul style="list-style-type: none"> <li>• The operator has been observed to operate the vehicle in an unsafe manner;</li> <li>• The operator has been involved in an accident or near-miss incident;</li> <li>• The operator has received an evaluation that reveals that the operator is not operating the truck safely;</li> <li>• The operator is assigned to drive a different type of truck; or</li> <li>• A condition in the workplace changes in a manner that could affect safe operation of the truck.</li> </ul>



# Safety Training - Tab 04

The following training requirements are summarized from Title 29, Code of Federal Regulations Part 1910.

Appendix 4.1		Frequency of Training					Special Notes
		A. Time of Hire			D. Work Changes		
		B. Upon Assignment			E. Non-compliance		
		C. Annually					
Title & Regulation	Required Audience & Elements	A	B	C	D	E	
	<ul style="list-style-type: none"> <li>Surface conditions where the vehicle will be operated;</li> <li>Composition of loads to be carried and load stability;</li> <li>Load manipulation, stacking, and unstacking;</li> <li>Pedestrian traffic in areas where the vehicle will be operated;</li> <li>Narrow aisles and other restricted places where the vehicle will be operated;</li> <li>Hazardous (classified) locations where the vehicle will be operated;</li> <li>Ramps and other sloped surfaces that could affect the vehicle's stability;</li> <li>Closed environments and other areas where insufficient ventilation or poor vehicle maintenance could cause a buildup of carbon monoxide or diesel exhaust;</li> <li>Other unique or potentially hazardous environmental conditions in the workplace that could affect safe operation.</li> </ul>						
<b>Dive Team Qualifications</b> OSHA 1910.410(a)	<p>Each dive team member shall have experience or training in the following:</p> <ul style="list-style-type: none"> <li>The use of tools, equipment, and systems relevant to assigned tasks</li> <li>Techniques of the assigned diving mode</li> <li>Diving operations and emergency procedures</li> </ul> <p>All dive team members shall be trained in CPR and first-aid</p>		X		X	X	<p>Dive team members who are exposed to or control the exposure of others to hyperbaric conditions shall be trained in diving related physics and physiology.</p> <p>The designated person-in-charge shall have experience and training in the conduct of the assigned diving operation.</p>
<b>Lead</b>  OSHA 1910.1025 (I)	<p>All affected employees shall be trained on the following:</p> <ul style="list-style-type: none"> <li>The content of this standard and its appendices</li> </ul>		X	X	X	X	Inform employees of and provide access to Appendices A and B of this regulation.

# Safety Training - Tab 04

The following training requirements are summarized from Title 29, Code of Federal Regulations Part 1910.

Appendix 4.1		Frequency of Training					Special Notes
		A. Time of Hire			D. Work Changes		
		B. Upon Assignment			E. Non-compliance		
		C. Annually					
Title & Regulation	Required Audience & Elements	A	B	C	D	E	
	<ul style="list-style-type: none"> <li>The specific nature of the operations which could result in exposure to lead above the action level.</li> <li>The purpose, proper selection, fitting, use and limitations of respirators.</li> <li>The purpose and description of the medical surveillance program.</li> <li>The engineering controls and work practices associated with the job assignment.</li> <li>The contents of any compliance plan in effect.</li> <li>Instructions to employees that chelating agents should not routinely be used to remove lead from their bodies and should not be used at all except under the direction of a licensed physician.</li> </ul>						
<b>Benzene</b>  OSHA 1910.1028(j)(3)	All affected employees shall be trained on the following: <ul style="list-style-type: none"> <li>The training program shall be in accordance with the requirements of 29 CFR 1910.1200(h)(1) and (2), and shall include specific information on benzene for each category of information included in that section.</li> <li>Explain contents of 1910.1028, including Appendices A and B, and indicate where the standard is available</li> <li>Explain the medical surveillance program and Appendix C</li> </ul>		X				Refresher training is required <b>annually</b> if exposures are above the action level.  All affected employees will also be provided Hazard Communication training.
<b>Bloodborne Pathogens</b>  OSHA 1910.1030(g)	Employees with occupational exposure to blood or other potentially infectious materials shall be trained on the following: <ul style="list-style-type: none"> <li>An accessible copy of the regulatory text of this</li> </ul>		X	X	X		An opportunity for <b>interactive</b> questions and answers with the person conducting the training is required.  The person conducting the training shall be knowledgeable in the subject matter covered

# Safety Training - Tab 04

The following training requirements are summarized from Title 29, Code of Federal Regulations Part 1910.

Appendix 4.1		Frequency of Training					Special Notes
		A. Time of Hire			D. Work Changes		
		B. Upon Assignment			E. Non-compliance		
		C. Annually					
Title & Regulation	Required Audience & Elements	A	B	C	D	E	
	<p>standard and an explanation of its contents</p> <ul style="list-style-type: none"> <li>Epidemiology and symptoms of Bloodborne diseases</li> <li>Modes of transmission</li> <li>The exposure control plan and how the employee can obtain a copy of the written plan</li> <li>Appropriate methods to recognize tasks which may involve exposure to blood and other potentially infectious materials</li> <li>The use and limitations of methods that will prevent or reduce exposure including engineering controls, work practices, and PPE</li> <li>Information on the types, proper use, location, removal, handling, decontamination and disposal of PPE</li> <li>Basis for selection of PPE</li> <li>Information on the hepatitis B vaccination and that the vaccination will be offered free of charge</li> <li>Who to contact and steps to take in the event of an emergency</li> <li>Procedures to follow in an exposure incident occurs, including the method of reporting the incident and the medical follow-up that will be made available</li> <li>Information on the post exposure evaluation</li> <li>Explanation of signs, labels, and color coding</li> </ul>						<p>by the elements contained in the training program as it relates to the workplace</p> <p>Training records shall be maintained for 3 years from the date of training, and shall include:</p> <ul style="list-style-type: none"> <li>Date of training session</li> <li>Summary of training material</li> <li>Name(s) of trainer(s)</li> <li>Qualifications of trainer(s)</li> <li>Names &amp; job titles of trainees</li> </ul>
<p><b>Hazard Communication</b></p> <p>OSHA 1910.1200(h)</p>	<p>Employees in workplaces with hazardous chemicals shall be trained on the following:</p> <ul style="list-style-type: none"> <li>The requirements of the OSHA Standard</li> </ul>		X		X		

# Safety Training - Tab 04

The following training requirements are summarized from Title 29, Code of Federal Regulations Part 1910.

Appendix 4.1		Frequency of Training					Special Notes
		A. Time of Hire			D. Work Changes		
		B. Upon Assignment			E. Non-compliance		
		C. Annually					
Title & Regulation	Required Audience & Elements	A	B	C	D	E	
	<ul style="list-style-type: none"> <li>Any operations in their work area where hazardous chemicals are present</li> <li>The location and availability of the written hazard communication program, including lists of hazardous chemicals and safety data sheets</li> <li>Methods to detect the presence or release of a hazardous chemical in the work area</li> <li>The physical and health hazards of the chemicals in the work area</li> <li>The measures employees can take to protect themselves from these hazards, including specific procedures the employer has implemented to protect employees</li> <li>Review of the Hazard Communication Program, including explanation of the labeling system and safety data sheets</li> </ul>						
<b>Heat Illness Prevention</b>  Cal/DOSH Title 8:3395	Requirements are detailed in Tab 10 of the safety manual: <ul style="list-style-type: none"> <li>Environmental and personal risk factors for heat illness, and the added burden of heat load on the body caused by exertion, clothing and PPE</li> <li>Review of the heat illness prevention plan</li> <li>Importance of frequent hydration and acclimatization</li> <li>Types, signs and symptoms of heat illness</li> <li>Importance of immediately reporting symptoms or signs of heat illness</li> <li>Procedures for responding to heat illness</li> <li>How emergency medical services will be provided, called and accessed</li> </ul>		X	X	X		Additional training requirements for supervisors are listed in Tab 10 of the Safety Manual.

## Safety Training - Tab 04

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The following training requirements are summarized from Title 29, Code of Federal Regulations Part 1910.

### **STATE OCCUPATIONAL SAFETY AND HEALTH PLANS**

As of March 2019, the following states operate under state-specified occupation safety plans which must meet or exceed the requirements of federal OSHA standards. Therefore, operations in these states potentially have different and/or additional requirements than those detailed in this document. It is incumbent upon the local management to identify and comply with state-specific plan requirements.

1. Alaska
2. Arizona
3. California
4. Hawaii
5. Indiana
6. Iowa
7. Kentucky
8. Maryland
9. Michigan
10. Minnesota
11. Nevada
12. New Mexico
13. North Carolina
14. Oregon
15. Puerto Rico
16. South Carolina
17. Tennessee
18. Utah
19. Vermont
20. Virgin Islands
21. Virginia
22. Washington
23. Wyoming

# Job Safety Analysis (JSA) Program

## Tab 05

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### **PURPOSE**

To establish a process to evaluate hazards and implement controls to prevent injury to Allied Universal employees. The Job Safety Analysis is not intended to provide a safety or security consulting project or feedback for our clients. Nevertheless, as discussed below, defects or hazardous conditions on a client's property must be reported to the client separately in writing. Do not share the JSA outside of the company.

### **SCOPE**

This program outlines procedures for developing a Job Safety Analysis (JSA) for each job and each post. The completed JSA will identify hazards associated with a specific job hazard or job task outlined in the post orders. Based on the identified hazards, safe work practices will be developed to reduce or eliminate those hazards.

### **APPLICATION**

This program applies to all job classifications. The requirements of this program are based on OSHA standards that require employers to identify hazards in the workplace and develop means to control those hazards.

### **RESPONSIBILITIES**

#### **Management:**

- Oversee program implementation so that JSAs are completed for each job and each post.
- Provide all employees training based on the JSA for their job.
- Review all JSAs for completeness when created, annually or as updates are needed.

#### **Managers/Supervisors:**

- Develop JSAs for all job tasks under their immediate control.
- Develop safe work practices and procedures based on completed JSAs.
- Train all employees on the hazards and safe work practices/procedures associated with their job posts.
- Document the JSA Acknowledgement Form (Appendix 5.1) for each newly-assigned employee.
- Enforce the use of safe work practices and procedures.
- Review/ update each JSA for completeness when created, at least annually or as needed.
- Review/ update each JSA for completeness when employee injury, accident or near miss is reported. Ensure hazards causing the injury, accident or near miss are corrected and documented on the JSA to ensure it does not recur in the future.
- Maintain a current copy of each post-specific JSA in an accessible location so that all affected employee have access to review the document as desired.

# Job Safety Analysis (JSA) Program

## Tab 05

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### Employees:

- Participate in developing JSAs.
- Follow all safe work practices and procedures.
- Inform management of any new or unrecognized hazards, or if a JSA is needed for a post.
- Review the JSA for each post assigned- to for work duties, and sign the JSA Acknowledgement Form upon assignment to a post.

### OVERVIEW

The Job Safety Analysis (JSA) is a tool used to improve overall safety and health in the workplace by identifying and correcting hazards associated with specific jobs or tasks. Appendix 5.4 illustrates the multi-step JSA process, which involves:

- List the sequence of job steps/tasks.
- Identify the potential hazards associated with each task.
- Note the frequency and severity associated with the task.
- Identify methods to control hazards.
- Document potential chemical exposures, training, equipment, and tools needed to perform the tasks.
- Communicate expectations of the JSA with all affected employees.
- Periodically review/update the JSA.

Developing a JSA is a joint effort between management and security professionals in which job activities are divided into individual steps to identify and eliminate/control hazards.

Once all hazards have been identified, appropriate controls can be implemented. The highest feasible level of hazard control should be implemented to protect employees, and often a combination of control methods will be applied. The hierarchy of controls is, in order of effectiveness:

1. Elimination – elimination of the hazard is the most effective means of hazard control. This involves the physical removal of the hazard.
2. Engineering Controls – engineering controls do not eliminate a hazard, but rather keep people isolated from hazards.
3. Administrative Controls – administrative controls do not remove hazards, but limit or prevent one's exposure to the hazard through changes to the way people work, including procedures, training, signs/ labels, etc.
4. Personal Protective Equipment – PPE is the least effective form of hazard control because this method only provides a barrier between the worker and the hazard.

# Job Safety Analysis (JSA) Program

## Tab 05

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### PROCEDURE

The account manager and supervisor(s) will take charge of developing and reviewing the post-specific JSAs for their respective sites. Security professionals/ employees should be engaged in the process of developing the JSA, to benefit the quality of the JSA and the effectiveness of the process.

The Allied Universal JSA form (Appendix 5.1) will be used to document the Job Safety Analysis. Specific JSA examples by post, job site and market are available online for reference. The final JSA document will need to be typed or neatly handwritten.

A post may have several associated job tasks; each task will be included on the post-specific JSA. It is suggested that you compile a list of these jobs and prioritize them by how often they are performed. Taking the most frequently performed job first, conduct a Job Safety Analysis for each of the jobs.

**1. JSA Team** - Identify who will take part in developing the JSA for each post. When possible, security professionals should be involved in creating the JSA, as the process increases awareness about risks and uses their valuable input regarding hazards and suggested controls. Management may complete independently if necessary, although engaging employees in the process is strongly recommended.

**2. Sequence of Basic Job Steps** - The first column of the JSA form (A) is titled Sequence of Basic Job Steps. In this column the job is broken down to list the basic steps performed to complete the post responsibilities. A problem may arise if the breakdown is too detailed or if it is too general. Each step should accomplish some major task. The wording for each step should begin with a verb or action word and should be concise and to the point. If you describe the step with more than one simple sentence, it can probably be broken down into two steps. No hazards are listed in this column.

**3. Potential Hazards (unsafe conditions)** - The second column of the JSA form (B) is titled Potential Hazards. In this column you will list hazards or unsafe conditions which could occur during the particular job step and may cause an injury or property damage. This section will only be started after all basic job steps have been identified. Items identified for this column may include unsafe acts and or unsafe conditions. You may find more than one hazard or unsafe condition associated with a single job step.

**4. Risk Ranking/Prioritization** - The third/fourth/fifth columns of the JSA form (C-E) are used to estimate potential risk and identify the priority by which to address hazards. In column (C) you will assign a number from 1-3, to represent how frequently the task is performed (see table below). In column (D) you will assign a number from 1-3, to represent the potential severity of an injury related to the hazard addressed in this row (see table below). In column (E) you will note the result of multiplying the numbers in the previous two columns:  $(C) \times (D) = (E)$ .



# Job Safety Analysis (JSA) Program

## Tab 05

RISK RANKING	Frequency	Severity
<b>1 = Low</b>	Task in performed infrequently, less than daily	Potential for a minor injury, that would likely only require on-site First Aid treatment
<b>2 = Medium</b>	Task is performed occasionally, at least once per day	Potential for an injury that would likely require off-site medical treatment
<b>3 = High</b>	Task is performed frequently, repeatedly on a given day	Potential for a serious injury that could result in time away from work to heal or inability to return to work

**5. Safe Job Procedure or Action** - The sixth column of the JSA form (F) is titled Safe Job Procedure or Action. In this column you will list corrective actions which can be taken to reduce or eliminate a hazard and reduce risk of injury. Feasible and effective corrective actions recommended by security professionals should be implemented to improve job safety and increase program buy-in. If recommendations made by employees are rejected or delayed by senior management, the reasons for rejection or delay must be explained to the parties involved for the program to maintain credibility.

When considering how to reduce the risk of a job task and which corrective actions should be implemented, the following questions may be helpful:

- Is the job step necessary to complete the job? (Elimination)
- Can the physical conditions that create the hazard be eliminated or modified? (Engineering Control)
- Can potentially hazardous materials be replaced with less hazardous ones or can environmental controls be instituted? (Engineering Control)
- Is there a better way to do the job or individual step? (Administrative Control)
- Are there mechanical or procedural changes that can be implemented to reduce the frequency with which the job must be done? (Administrative Control)

RISK PRIORITIZATION	EXPECTED ACTION
<b>E = 1 or 2</b>	Use the questions listed above to determine if the identified risk can be eliminated or reduced. Personal Protective Equipment (PPE) may be applied to reduce risk.
<b>E = 3</b>	Use the questions listed above to determine if the identified risk can be eliminated or reduced. PPE may be applied to reduce risk in conjunction with Administrative Controls.
<b>E = 6 or 9</b>	Use the questions listed above to determine if the identified risk can be eliminated or reduced. Use of Personal Protective Equipment is NOT sufficient alone to reduce risk. Elimination, Engineering Controls and/or Administrative Controls must be put in place before PPE is considered.

# Job Safety Analysis (JSA) Program

## Tab 05

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Each JSA will be reviewed by management for completeness and to verify that that corrective actions identified are adequate and implemented.

Methods of safe practice or general safety rules will be developed from the control measures identified in the JSA. These general safety rules will be used for training of new and existing employees. Employees should be held accountable for following safety rules outlined in their post-specific JSA as well as any safety rule that applies to their work at Allied Universal. Management must also be held accountable for enforcing these general safety rules.

**6. Potential Chemical Exposure** - Column (G) of the JSA form is titled Potential Chemical Exposures. In this column you will list any chemicals used by the security professional, used in the proximity of the security professional, or used in process which the security professional could be exposed to in the event of disruption or emergency. All chemicals identified here must be included in the Hazard Communication training plan for employees who work the given post. Note - requirements detailed in Tab 11 of the Corporate Safety Manual regarding Safety Data Sheet access, training, etc.

**7. PPE/ Tools/ Equipment** - Column (H) of the JSA form is titled Required Personal Protective Equipment &/or Tools. In this column you will list any equipment, tools or PPE that the employee will use at this post. This list is to be used to determine training requirements. PPE training is required annually, as detailed in Tab 4 of the Safety Manual. Note - requirements detailed in Tab 13 of the Corporate Safety Manual regarding selection of equipment, replacement supply, training, etc.

**8. Training** - Column (I) of the JSA form is titled Required Training. In this column you will list training requirements for employees working this post. Reference columns (G), (H) and possibly (F) to create the list of training requirements.

### NOTIFICATIONS

The client or property owner **MUST** be advised **IN WRITING** of each and every physical hazard or defective condition identified on the property. The JSAs are strictly for internal use **ONLY** and should **NOT** be provided to anyone outside of Allied Universal without Legal approval. Questions/concerns about how this information is provided should be directed to the BM, VP of Operations or Regional President.

Each security professional will review the JSA for each assigned post, initially upon assignment. Newly-hired security professionals will complete the JSA Acknowledgement Form as part of their onboarding training.

# Job Safety Analysis (JSA) Program

## Tab 05

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### JSA REVIEW/ UPDATE

Each post-specific Job Safety Analysis will be reviewed and updated as needed in the following circumstances:

- When there are changes to the workplace environment, equipment, procedures or scope of work (tasks);
- Following a safety incident; employee injury, accident or near miss, including a vehicle accident.
- Each JSA will be reviewed at least annually.

When a JSA is updated/revised, the new version should be shared with all affected employees at that post in a timely manner.

# Job Safety Analysis (JSA) Program - Tab 05

	<b>Job Safety Analysis Appendix 5.1</b>	<b>Job Number:</b>			<b>Job Name:</b>		
		<b>Post:</b>					
		<b>Prepared By:</b>					
		<b>Date Approved:</b>			<b>Approved By:</b>		
		<input type="checkbox"/> <b>Evaluated Daylight Hours</b>			<input type="checkbox"/> <b>Evaluated After Dark</b>		
(A) Sequence of Basic Job Steps	(B) Potential Hazards (i.e., use of ladders, interaction w/ public)	(C) Freq.	(D) Sev.	(E) Risk	(F) Safe Job Procedure or Action		
(G) Potential Chemical Exposures	(H) Required Personal Protective Equipment &/or Tools			(I) Required Training			

# Job Safety Analysis (JSA) Program - Tab 05

HAZARD ASSESSMENT FORM Appendix 5.2			
Client Name /Account Number			
Describe Client's Operation			
<p>Managers use this form to evaluate potential hazards which employees may be exposed to in the workplace. When an exposure to a hazard is identified it will be documented on this form. Documented hazards will be addressed with the client for remedy where appropriate. Where exposures remain those items will be addressed on the Job Safety Analysis form</p>			
Potential Exposure Hazards	Exposure Occurs	Hazard addressed with client	Exposure addressed on JSA
1. Driving registered vehicle or specialized patrol vehicle			
2. Interior Foot Patrol – interior walking hazards			
3. Exterior Foot Patrol – exterior walking hazards			
4. Weather extremes (Heat/Cold, storms, etc.)			
5. Excessive noise levels			
6. Working at heights (over 4-feet above lower level)			
7. Sitting			
8. Use of stairs (interior or exterior)			
9. Use of ladders or step stools			
10. Lifting/carrying/pushing/pulling of materials			
11. Chemical use or chemicals in process environment			
12. Machinery operations – moving parts, airborne			
13. Explosion potential			
14. Armed post			
15. Inspect incoming/ outgoing vehicles/trucks			
16. Vehicle traffic or train movement			
17. Bloodborne Pathogens			
18. Radiation			
19. Firefighting or confined space rescue activities			
20. Patient restraint			
21. Altercations with others			
22. Other potential physical hazard			

# Job Safety Analysis (JSA) Program - Tab 05

## JSA Acknowledgement

### Appendix 5.3

Security Professionals' Name:	
Employee Number:	
Job Number:	
Client/ Worksite Name:	
Client/ Worksite Address:	
Post(s):	
Account Managers' Name:	

**I hereby acknowledge that my Manager has reviewed the Job Safety Analysis for each job/post/task for which I am assigned.**

\_\_\_\_\_  
Employee's Signature & Date

\_\_\_\_\_  
Account Manager's Signature & Date

After completing this form, give to your Account Manager for submission to the Branch Office for entry into WinTeam, and your personnel file. Account Manager's signature is required prior to entry into WinTeam.

**For internal use only:**

This code is to be entered into the employee's WinTeam Compliance Tracker.

Use WT Code: JSA Acknowledgement (enter the job # in the Notes field).

*For those employees working at multiple job sites, a JSA Acknowledgement Form must be completed and entered for each job #.*

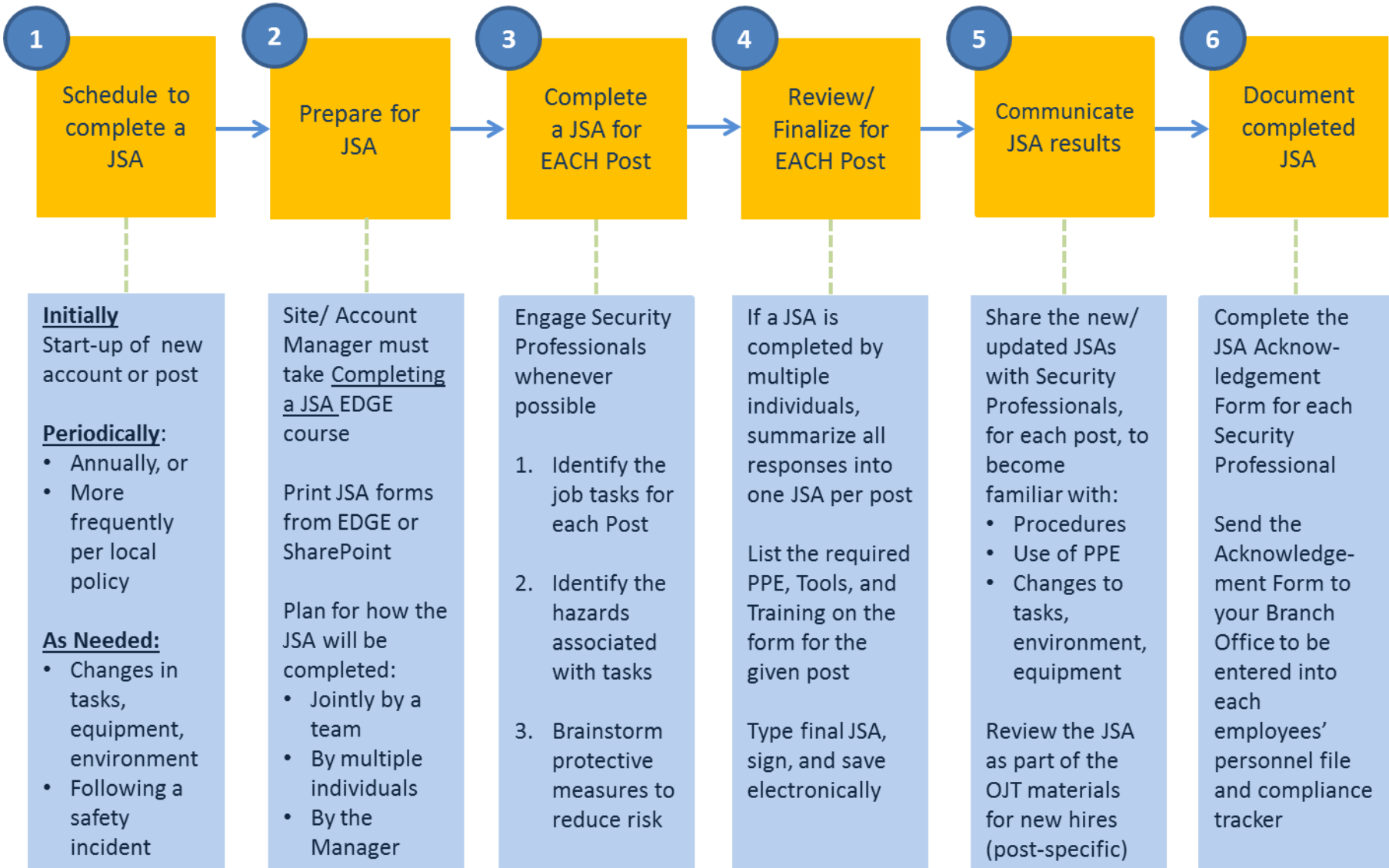
Date entered into WinTeam Compliance Tracker:

Entered by:

(please print legibly)

**This document is to be kept with the employee's personnel file at all times.**

## Appendix 5.4 Job Safety Analysis Workflow



# Managing Medical Care

## Tab 06

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### **PURPOSE**

The purpose of this policy is to ensure that adequate medical care is available to employees who incur an injury or illness in the workplace. Allied Universal strives to prevent all injuries and/or illnesses from occurring through the implementation of the Injury and Illness Prevention Program, but sites should be prepared to respond to the medical needs which may arise in the workplace.

### **SCOPE**

This policy applies to all work sites where Allied Universal employees perform their work. The items outlined in this policy are established to prepare for potential work-related medical needs. Personal illness and injury needs are not to be serviced through the scope of this policy.

### **DEFINITIONS**

#### **Health Access Cards:**

Document that shall act as an identification card for workers' compensation insurance coverage and should be presented upon arrival to any medical provider that is providing treatment for a work-related injury or illness. This document also includes the return to work form.

#### **Light Duty Work:**

A change in normally assigned duties for a temporary time period to accommodate recovery as required by the treating medical provider. Light Duty work (also referred to as 'restricted duty' or 'modified duty') may include:

- Reduced or altered work hours
- Limited or restricted work activities
- Physical activity limits
- Temporary assignment to a different position

#### **Lost Time:**

A period of one or more consecutive days when the employee does not work to accommodate recovery at the direction of the treating medical provider.

#### **Panel Physicians List:**

List of network health care providers in proximity to the work site.

### **RESPONSIBILITIES**

#### **All Employees have the responsibility to:**

- Report all hazards, near miss events, injuries or illnesses to your supervisor or manager immediately (before the completion of the shift in which they occur).
- In states where care can be directed, employees are responsible to utilize panel physicians.
- Provide documentation of medical treatment received associated with a work-related injury or illness to the employee's manager and to the identified Workers' Compensation Adjuster. This documentation will include, but is not limited to bills for service, physicians' notes for light duty work or lost time and the physicians' clearance to return to work.



# Managing Medical Care

## Tab 06

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### All managers and supervisors have the responsibility to:

- Utilize sections of the Corporate Safety Manual to reduce the risk of injury or illness to Allied Universal employees.
- Ensure that person(s) who have a valid certificate in First Aid training, through the American Red Cross or other equivalent organization, shall be available at work sites to render emergency first aid.
- Establish site-specific procedures for prompt medical attention in case of serious injury.
- Establish site-specific procedures to ensure prompt transportation of the injured person to a physician or hospital.
- Maintain current emergency contact lists, including internal incident reporting contacts as well as physicians, hospitals or ambulances readily available.
- Communicate in a timely manner with Allied Universal management and client representatives, as defined locally, about injuries and/or illnesses reported by employees.
- Review the Daily Activity Report for each shift for reports of hazards, near miss events, injuries or illnesses.
- Maintain and inspect first aid supplies that are accessible for employee use, as described in this policy (Appendix 6.1) .
- Direct employees to complete drug testing, per the Drug-Free Workplace policy, following a work-related injury, illness or vehicle collision.
- Communicate the expectations of this policy and the procedures for access to on-site and off-site medical care to all Allied Universal employees.
- Verify that the Workers' Compensation Adjuster contact information and Health Access Cards are received by employees seeking treatment for a work-related injury/illness.
- Provide all documentation received from employees detailing treatment of a work-related injury or illness to the local Human Resources representative and to the identified Workers' Compensation Adjuster.
- Maintain any/ all records of employee's medical care in a confidential manner, separate from the employee's personnel file.

### The Risk Management Department has the responsibility to:

- Provide access to a current list of panel physicians.
- Provide a process for Health Access card distribution.
- Oversee the process of recordkeeping of injuries and illnesses per the 'OSHA Recordkeeping' section of the Corporate Safety Manual.
- Maintain any/ all records of employee's medical care in a confidential manner, separate from the employee's personnel file.

# Managing Medical Care

## Tab 06

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### **The Human Resources Department has the responsibility to:**

- Assist managers with locating light duty work opportunities that meet any work restrictions provided by the approved Workers' Compensation medical provider for injured/ill employees returning to the work environment.
- Maintain separate employee medical files to retain documentation associated with treatment of work-related injuries or illnesses; these confidential documents will be retained in compliance with the requirements of the Access to Employee Medical Records Policy.
- Manage compliance with the Guidelines for Workers' Compensation Leaves of Absence and that these guidelines are communicated to affected employees.

### **The Training and Development Department has the responsibility to:**

- Provide or direct training resources to meet or exceed the training requirements as described in this policy.
- Provide resources needed to track and record the successful completion of the training requirements as described in this policy.

### **POLICY**

A Job Safety Analysis (JSA) will be completed for each job site and will include each assigned job task. The purpose of the JSA is to determine what hazards employees are or may be exposed to in the course of their work for Allied Universal.

When the JSA process identifies any situation where the eyes or body of an employee may be exposed to injurious corrosive materials, suitable facilities such as Saline eyewash and/or shower shall be provided by Allied Universal to be immediately accessible.

Employees who experience a work-related near miss event or an injury/illness will report those events to their supervisor or manager as required by the 'Incident Reporting and Investigation' section of the Corporate Safety Manual.

For minor injuries/illnesses where self-treatment is adequate, or where temporary First Aid care is needed, first aid supplies will be available for employee use, stored in a weatherproof container with individually sealed packages for each item.

Employee(s) at the work site will be trained and certified to provide lay responder emergency First Aid and CPR. It is the policy of Allied Universal that only trained and currently certified persons should provide such care, and that no person can be compelled as a lay person to provide treatment as a condition of their employment.

Emergency contact lists, and panel physician lists (where applicable) will be kept current and maintained in a location accessible for employee use.

Employees involved in a safety incident may be subject to drug testing.

# Managing Medical Care

## Tab 06

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Managers or supervisors may accompany the employee to the medical provider for treatment of a work-related injury or illness. In such cases managers and supervisors should inform the medical provider that light-duty work may be arranged to expedite the employee's return to work. The medical provider should address that the physical demands of the normally assigned job tasks are assessed to ensure they can be safely performed.

The manager/ supervisor will work to return the employee to full duty in conjunction with the physician's recommendations and medical clearance that the employee is fit to return to work. Whenever possible and to the extent it does not result in an undue hardship, the site management and HR team will modify duties and/or the work environment to accommodate the Light Duty requirements consistent with the restrictions prescribed by the treating physician so the employee can safely return to work.

The employee will provide all documentation regarding treatment to their Supervisor and the assigned Workers' Compensation Adjuster in a timely manner.

All medical records are confidential and will be handled, shared and maintained in accordance with Safety Manual Tab 17 – Access to Employee Medical and Exposure Records. Records of medical treatment shall be secured to limit access and shared only with the Workers' Compensation Adjuster and those individuals who need to have access to the information for OSHA Recordkeeping and related work accommodation purposes.

### **EMPLOYEE TRAINING**

All employees will be informed initially upon assignment, and when changes to the process are made:

- On the site-specific procedures to accessing on-site and off-site medical care,
- On the content of this policy

Employees may be offered or asked to take part in First Aid, CPR and/or AED training. Such training will be provided by a certified individual. Upon successful completion of the training employees will receive a lay-person certification to provide such treatment at will, for a period of time determined by the certifying organization.

### **RECORDKEEPING**

Employees will initially report all incidents of near miss, injury, illness or vehicle accident as required by Safety Manual Tab 7 – Incident Reporting and Response. The manager/supervisor will report these incidents to the Workers' Compensation third-party administrator within 4 days.

The manager/supervisor will maintain all documentation of the incident, including the incident investigation records, on site for 5 years.

The local OSHA Administrator will document all injury cases as described in Safety Manual Tab 18 – OSHA Recordkeeping.

The completion of employee training, as described herein, will be documented in Win Team.

# Managing Medical Care

## Tab 06

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### Mandatory First Aid Supplies List

#### Appendix 6.1

All Allied Universal sites shall maintain first aid supplies to be available for employee use. Additional supplies may be made available, but at minimum the below list of supplies shall be stored in a weatherproof container with individually sealed packages for each item.

#### Minimum First Aid Kit Inventory:

1. Gauze pads (at least 4 x 4 inches).
2. Two large gauze pads (at least 8 x 10 inches).
3. Box of adhesive bandages (band-aids).
4. One package of gauze roller bandage at least 2 inches wide.
5. Two triangular bandages.
6. Wound cleaning agent such as sealed moistened alcohol pads.
7. Scissors.
8. Tweezers.
9. Insect sting/bite relief wipes.
10. Adhesive tape.
11. Medical gloves, made of nitrile (preferred) or latex.
12. Resuscitation equipment such as resuscitation bag, airway, or a pocket mask.
13. Two elastic wraps.
14. Splint.
15. Directions for requesting emergency assistance.

# Incident Reporting & Response

## Tab 07

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### **PURPOSE**

To provide direction for reporting and responding to incidents involving employee injury, vehicle damage, and near miss incidents.

### **SCOPE**

This program outlines procedures for reporting, investigating and responding to incidents that result in, or could have resulted in personal injury and or property damage. Prompt reporting of incidents and thorough response will aid in determining the root cause of an incident and establishing corrective actions to prevent future incidents.

This program details the responsibilities of management, per federal law, to report certain types of severe incidents to OSHA within 8-hours of the occurrence.

### **APPLICATION**

This program applies to all Allied Universal (AUS) offices and sites.

### **RESPONSIBILITIES**

#### **Management:**

- Oversee program implementation so that incidents are reported and responded to in accordance with these guidelines.
- Manage compliance with this process and the corporate Whistleblower Protections policy so that no employee reporting a safety incident is subject to retaliation for doing so.
- Review incident responses for accuracy and verify timely completion of action items.
- Report all fatality or severe injury/illness events, per direction of this section, promptly to the Corporate Safety Management Team and then the local OSHA office.

#### **Managers/Supervisors:**

- Establish incident reporting procedures for the site and provide instruction to all employees on when and how to report a Near Miss, Injury, Illness or Vehicle Collision. Receive these reports and respond to incidents without retaliating against employees, as detailed herein and in the corporate Whistleblower Protections policy.
- Immediately report all fatality or severe injury/illness events up the management chain of command.
- Report all work-related Near Miss, Injury or Illness incidents and Vehicle Collisions to the Third Party Administrator (or monopolistic state organization) within 48 hours of receiving notification of the event; and to the client per local requirements.
- Report all vehicle collisions through the AUS vehicle accident process.
- Complete the Incident Reporting & Response training module(s) on the EDGE and be familiar with the corporate Whistleblower Protections policy.
- Conduct an incident response as described herein.
- Complete all assigned Corrective Actions within the specified time-period.

# Incident Reporting & Response

## Tab 07

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### Employees:

- Report all Near Miss, Injury, Illness and Vehicle Collision incidents promptly– before the end of the shift in which the incident occurred.
- Cooperate and take part in the incident investigation process.
- Offer input as to how an incident could have been prevented for ongoing safety improvement.

### DEFINITIONS

**Employee Fatality** – Any situation which results in the death of an Allied Universal employee, including all heart attack deaths; the cause/circumstances of death (work-relatedness) should not be considered for OSHA reporting purposes.

**Immediate Cause** – The event or condition that directly led to the incident.

**Near Miss** – Incident, action or hazard encountered in the workplace which does not result in an injury, property damage, vehicle damage or other loss, but had the potential to do so.

**Root Cause** – The underlying reasons for why the immediate cause(s) existed.

**Severe Incident** – For OSHA reporting purposes, a severe incident is any incident resulting in a work-related fatality, in-patient hospitalization, amputation or loss of an eye of one or more employees.

For internal investigation purposes, this definition should also include any incident that did or could have limited someone's ability to perform their normally assigned job duties, significant property damage or loss, or major deviation from accepted safe practices that could expose the company to liability.

**Solution Team** – The Solution Team is a small group of company representatives who gathers to complete the root cause analysis. The solution team includes a minimum of three people: the supervisor of the involved employee and the manager of that supervisor, and a subject matter expert (SME). Whenever possible the SME will be the involved employee; when the involved employee is not able to participate they may be replaced on the team by another employee who completes the same task/ job. The Solution Team will determine if any additional people should be invited to join the team on as needed.

**Vehicle Collision** – Incident which results in property damage, vehicle damage, or injury to a person, involving a licensed motor vehicle

**Work-related** – Any incident which occurs within the course and scope of employment.

# Incident Reporting & Response

## Tab 07

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### I. INCIDENT REPORTING REQUIREMENTS

- A. Reporting Procedures for Employees and Supervisors
- B. Reporting Safety Concerns
- C. OSHA Notification of Severe Incidents

#### I.A. Each site will establish an Incident Reporting procedure, which will outline:

- Names of people who will receive incident reports, and how to contact each.
- Instructions for how to report incidents. Sites are encouraged to utilize Appendix 7.2, the Employee Incident Report Form to document incident reports.
- Off-hour reporting procedures, if these differ from routine reporting procedures.
- Supervisors/ Managers are responsible to inform each employee of their right to report a safety incident and of the reporting procedures in place initially upon the employee's assignment to the site and when the reporting procedure is modified.

**All employees will promptly report injuries, vehicle collisions, and/or near miss events to their manager/supervisor.** In most cases this will be done immediately, but in some situations this notification may be slightly postponed. In ALL situations, these events will be reported before the end of the shift in which they occur.

Employees may use the Employee Incident Report Form (Appendix 7.2) to document and report an incident. The employee statement providing a description of what happened is the first piece of information the investigator will have to begin the investigation phase of the response.

Every employee has the right to report a safety incident without fear of retaliation. See the corporate Whistleblower Protections policy for further details.

#### **Upon notification of an injury, vehicle collision or near miss event, supervisors/managers will:**

- Promptly eliminate or guard access to hazards in the area where the incident occurred, to reduce risk to others.
- Discuss with the involved employee if medical care is needed. The employee may self-administer First Aid, First Aid care may be administered by a certified person, or off-site care may be sought. When off-site medical care is needed, supervisors/managers will provide employees with a list of local Panel Physicians (found on the internal SharePoint site), per state requirements.
- Report the incident to the client, per local procedures and contract requirements.
- Report all incidents to the Third Party Administrator (TPA) by phone or via monopolistic state specific requirements. The First Report of Injury form will be used to document necessary information prior to the call. The phone number for TPA is listed at the top of this form. This notification should be made by the end of the shift in which the incident is reported, but never later than 48 hours after the incident report.
  - Monopolistic States include: Ohio, North Dakota, Washington, Wyoming

# Incident Reporting & Response

## Tab 07

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- Report all vehicle collisions, regardless of vehicle ownership, through the AUS vehicle accident reporting process. This means that vehicle collisions are also reported to the TPA as a Near Miss if no injury resulted.

### I.B. Methods to Report Safety Concerns (and Safety Incidents)

Employees with safety concerns can communicate with their site supervisor/manager, local Human Resource representative or send safety questions/concerns to [safety@aus.com](mailto:safety@aus.com). If further support is needed employees can also call **Allied Universal Employees First at 1-800-461-4330 in the United States, or at +1-720-514-4400 outside of the United States**, or make an anonymous report online at <http://employeesfirst.aus.com> if at any time when they:

- Do not feel comfortable contacting the designated supervisor;
- Do not feel your concern was appropriately addressed;
- Do not have the contact information for the appropriate person;
- Have not received a response to your concern within 10 business days.

Employees can make this call 24 hours a day, 7 days a week anonymously; however, providing a name will allow a more direct and personal response. The sole purpose of the Hotline is to get the concern to the appropriate person so that the issue can promptly be resolved.

Nothing in this manual prohibits employees from reporting possible violations of federal, state or local law or regulation to any government agency or entity and any agency inspector general, or making other disclosures that are protected under the whistleblower provisions of federal, state or local law or regulation. While Employees are encouraged to bring any such possible violation to the attention of Allied Universal. Employees do not need the prior authorization of Allied Universal to make any such reports or disclosures to these entities.

In the event that an employee is unable to report an incident using the site reporting process, or is uncomfortable reporting a safety incident to their supervisor/manager, they may report such an incident via The SECURITY VOICE HOTLINE, as described above. Employees are encouraged to first use the established reporting process for their site and only report safety incidents via the hotline as needed.

### I.C. OSHA Notification Requirements

**In the event of an employee fatality or severe injury/illness, management must provide prompt notification to the nearest OSHA office.**

**Upon notification of an employee fatality or severe injury/illness, supervisors/ managers will:**

- Immediately make notifications up the organizational chain of command. Prior to notifying OSHA, someone in the regional management team will notify the corporate Legal Service Group and Corporate Communications of the situation.
- Determine with upper management if and how notification will be made by an Allied Universal representative to the employee's emergency contact(s), to the media, and/or to the client.



# Incident Reporting & Response

## Tab 07

- Provide prompt notification of a severe incident to the appropriate state or federal agency within the required time period.
- **Federal OSHA Notification:** Make notification to the local area OSHA office, or call 1-800-321-6742, as detailed in the below table. At the completion of the call request and document the name of the person you spoke with.

TYPE OF SEVERE INCIDENT	Federal OSHA		California Cal/OSHA		Other State Plans**
	Scope	Deadline	Scope	Deadline	
Amputation of any body part	Work-related only	Within 24 hours	All severe incidents, including non-work related events must be reported.	Within 8 hours	Verify state-specific requirements as they may differ slightly from Federal OSHA Reporting requirements. Visit <a href="http://www.osha.gov/dcsp/osp/">www.osha.gov/dcsp/osp/</a> for details
Hospitalization of 1 or more employees	Work-related only	Within 24 hours			
Loss of an Eye	Work-related only	Within 24 hours			
Fatality – other than those detailed below	Work-related only	Within 8 hours	California additionally requires notification of any 3 <sup>rd</sup> degree burns and any permanent disfigurement/disability.		
Fatality resulting from a heart attack	Report all	Within 8 hours			
Fatality resulting from a motor vehicle collision	No report required	N/A			
Fatality resulting from a suicide	No report required	N/A			

- **\*\*Other State Plans:** Operators in the following states must consult state-specific requirements for fatality/severe incident reporting, which may differ slightly from Federal OSHA requirements. Visit [www.osha.gov/dcsp/osp/](http://www.osha.gov/dcsp/osp/) for details:

Alaska, Arizona, California, Connecticut, Hawaii, Illinois, Indiana, Iowa, Kentucky, Maine, Maryland, Michigan, Minnesota, Nevada, New Jersey, New Mexico, New York, North Carolina, Oregon, Puerto Rico, South Carolina, Tennessee, Utah, Vermont, Virgin Islands, Virginia, Washington, Wyoming.

**Note: in California non-work-related events which occur in the workplace must be reported.** Make notification as soon as possible, but within 8 hours. At the completion of the call request and document the incident case number and/or identification number of the representative who received the report.

# Incident Reporting & Response

## Tab 07

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### II. INCIDENT RESPONSE

- A. Incident investigation,
- B. Root cause analysis and
- C. Corrective actions

The purpose of an incident response is to gather facts about the incident so a root cause analysis and corrective actions may be implemented to prevent reoccurrence; not to identify fault or blame. An investigation which seeks to identify fault or blame is counterproductive and not in line with the company safety culture.

The investigator(s) will gather facts, to identify all potential causes, working without assumption or bias. The Solution Team will use this information to determine what corrective actions may be implemented to prevent reoccurrence. Allied Universal training on the responsibilities and process of how to conduct this phases of the incident response will be available on the Allied Universal **EDGE**.

All incidents, including Near Misses, will be responded to as soon as possible. The response to severe incidents will be initiated within 24 hours from the time the incident was reported. Local management will determine if a non-severe Near Miss report warrants a full response and involvement of a Solution Team or if the issue can be adequately responded to by an individual Manager/ Supervisor.

#### II.A. Incident Investigation Process

An incident investigation is conducted to collect information about the incident and gain an understanding of what and how the incident occurred. The steps of this process include:

1. Survey the Scene
2. Conduct Interview(s)
3. Document the Facts

The following incident response procedure will be used, unless the client requires a local equivalent investigation process to be used:

##### 1. Survey the Scene:

- Whenever possible the investigator will visit the location where the incident occurred. If this is not possible, photos will be taken at the scene to evaluate the physical conditions of the area. The investigator should survey for any/all factors that could contribute to the incident.
- Eliminate or guard against hazards in the area where the incident occurred to reduce risk to others in the area. Any hazardous conditions shall be reported to the client or property owner.
- For serious incidents, evidence related to safety incidents will be collected, preserved and secured.

# Incident Reporting & Response

## Tab 07

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### 2. Conduct Interviews:

- A Human Resources representative or local manager will interview the employee(s) involved in the incident in a manner that conveys concern for the employee and with a goal to fix the problem that caused the incident. This is achieved through use of open-ended questioning and active listening skills.
- Ask questions that lead to facts, while avoiding opinions. Finish the interview by asking 'how do you think this incident could have been prevented?'
- Some incident investigations may involve additional interviews, including witnesses, or others with related work, etc.
- Interviewing employees after an incident can be difficult. Employees may be uncooperative if they are afraid of ridicule, worried about creating a bad impression, or concerned about disciplinary action. The following guidelines will help the investigator conduct a productive interview:
  - Show concern for the employee's injury, no matter how minor.
  - Explain the investigation process and that the goal is to understand what happened in order to prevent a future similar incident from occurring.
  - Use a friendly/ cooperative approach.
  - If possible, discuss the incident at the scene.
  - Get the injured employee's story before asking questions.
  - Check your understanding of the story.
  - Listen carefully. Avoid interrupting.
  - Use tact in clearing up discrepancies in employee's story.
  - Avoid sarcasm, blame and threat.
  - Discuss ways to prevent a recurrence. Ask the involved/ affected employees for their suggestions.
  - Avoid using the word 'why' when asking what people did. (It causes people to justify and defend their actions.)

### 3. Document Facts:

- Investigators will use the Incident Investigation Form (Appendix 7.1) to document the results of the investigation.
- Other documentation including notes, photos, etc. will be retained on file.
- Facts to be sought include (but are not limited to):
  - Who was involved?
  - What happened?
  - When and how did the event take place?
  - Did the employee complete the JSA Acknowledgement form upon assignment?
  - When was the JSA last updated,
  - What procedures applied to the work activity?
  - What equipment and/or PPE was used?
  - What related training was completed prior to the incident?
  - What (if anything) was abnormal prior to the incident?
  - What hazards were present, etc.?

# Incident Reporting & Response

## Tab 07

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- Photographs or video recordings should be utilized as necessary in conjunction with investigations of incidents involving personal injury, property damage (including motor vehicles), equipment or material failure, and all incidents that may even remotely involve third party action or omission. This builds defenses against liability claims.
- Photographs should be sufficient in number to adequately reflect the general area as well as pertinent details from a variety of angles. It is better to take too many than not enough. Photographs should be taken as soon as possible following the incident. Identify each print on its reverse side as follows:
  - Name of injured (if equipment damage, type; if property damage, location)
  - Date of incident
  - Photographer's name
  - Time photographs taken (date, if different from occurrence)
  - Direction facing and
  - Brief description of photo (i.e., what it shows)

### II.B. Root Cause Analysis Process

The Analysis and Follow-up stage of the response is used to evaluate the underlying causes which can be addressed to prevent reoccurrence.

A Solution Team will be assembled to use the Fishbone (Ishikawa) method of Root Cause Analysis (RCA) to analyze what factors contributed to cause the incident. The Solution Team will remain open-minded to the fact that more than one line or cause may result from this process.

#### **Conduct the Fishbone Root Cause Analysis:**

This process is used to identify the underlying causes of the incident, not the immediate causes. The purpose of conducting the RCA is to determine what system or process failed so that this incident could occur. A RCA which points directly and solely to an employee behavior or error as the root cause of the incident should not be accepted without review by upper management.

Solution Team members will receive training on the Fishbone RCA process via the Incident Investigation module(s) on the EDGE. Together the Solution Team will:

- Step 1: Write the problem statement. This is a brief description of the negative outcome resulting from the incident being analyzed. The major categories (fish bones) will include: Environment/ Materials, Equipment, Process/ Management and People.
- Step 2: Brainstorm all possible causes, asking "why did this happen?" The list of questions (provided in Appendix 7.3) for each major category is a starting point, but the Solution Team is encouraged to consider other potential causes. Sub causes will be added to the fishbone and causes.

# Incident Reporting & Response

## Tab 07

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- Step 3: The Solution Team will write possible issues that contributed to the incident on the appropriate fish bone. For each item noted the team will dig deeper through questioning to analyze how that issue contributed to the incident and what caused that issue.
- Step 4: The Solution Team will select between one-to-three causes from Step 3, ranking these in priority from the most significant to least significant issue that contributed to cause the incident.

### **Determine Causes:**

The Solution Team will determine the Immediate and Root Causes for the incident. Even simple incidents may have multiple causes. Causes will be determined through the ranking process in step 4 of the RCA; there is no limit to how many causes may be identified. The purpose of identifying these causes is to generate improvement recommendations and effective corrective actions.

### **II.C. Implement Corrective Actions**

A repeat of the incident can be prevented when the underlying causes of an incident are identified and adequately addressed.

The Solution Team will propose corrective actions for each cause identified. Each corrective action will be assigned to an individual for implementation, to be completed as soon as possible following the incident. A due date shall be assigned to each corrective action and the resolution and date documented.

It is the responsibility of local management to manage this process and hold individuals accountable to complete the assigned corrective actions in a timely manner.

# Incident Reporting & Response

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### EMPLOYEE INCIDENT REPORT FORM- APPENDIX 7.1

**1. When did the incident occur?**

Date:

Time:

**2. When did you report the incident to your Supervisor/ Manager?**

Date:

Time:

**3. What type of incident occurred? (circle one)**

Near Miss (no injury or damage)

Injury or Illness

Vehicle Collision

Other

**4. Describe the incident; what happened?**

---

**Employee Name**

**ID Number**

**Employee Signature**

**Date**

# Incident Reporting & Response

## Tab 07

### INCIDENT INVESTIGATION FORM - APPENDIX 7.2

#### General/ All Incidents

Job Name \_\_\_\_\_

Job Number \_\_\_\_\_

Was this a Temporary Job? Yes No Unknown

Account Manager \_\_\_\_\_

Branch Office \_\_\_\_\_

Name of Employee Involved \_\_\_\_\_

Employee Number \_\_\_\_\_

Incident Date (MM/DD/YY) \_\_\_\_\_

Incident Time (Include AM or PM) \_\_\_\_\_

Time in Shift Early in shift Mid shift End of shift Unknown

Type of Incident Near miss Injury/Illness Vehicle Collision Other

Brief Description of incident: \_\_\_\_\_

Medical Treatment None Self First Aid on site Provided First Aid on site Medical Provider

Date Incident Reported to Manager (MM/DD/YY) \_\_\_\_\_

Date Manager Reported to TPA (MM/DD/YY) \_\_\_\_\_

Witness Name(s) \_\_\_\_\_

Where did the incident occur? Indoor Outdoor

Describe where on property the incident occurred \_\_\_\_\_

What weather conditions may have played a factor in the incident? (Check all that apply)

Clear Cloudy Foggy Ice Rainy Sleet Snow Sunny Windy Extreme heat  
Extreme Cold Weather not a factor N/A

What were the lighting conditions at the time of the incident? Dim indoor dim outdoor Missing/broken  
light Sun glare Safe indoor Safe outdoor Unknown

What was the task being performed at the time of the incident? \_\_\_\_\_

Was employee following post orders/ procedures? Yes No Unknown

Further description: \_\_\_\_\_

Was employee rushing at the time of the incident? Yes No Unknown

Further description: \_\_\_\_\_

Was employee distracted, unfocused or multitasking at time of incident? Yes No Unknown

# Incident Reporting & Response

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Was employee previously trained to safely complete task? Yes No Unknown

Was the employee working overtime or an additional shift? Yes No Unknown

Was there an existing JSA for the post/ activity? Yes No Unknown

Was the JSA reviewed in the last 12 months? Yes No Unknown

Date of last JSA review (MM/DD/YY) \_\_\_\_\_

Did the employee sign the JSA Acknowledgement? Yes No Unknown

Date of Acknowledgment signature (MM/DD/YY) \_\_\_\_\_

Was the hazard involved in the incident included on the current JSA? Yes No Unknown

Are JSA updates needed as a result of this incident? Yes No Unknown

Additional JSA Comments \_\_\_\_\_

For the incident types listed below, continue to complete the additional section:

- Fall incidents
- Assault incidents
- Vehicle/ Transportation incidents

### Complete this section for all Fall Incidents

Answer questions 1-6, then complete the additional questions matching the type of fall selected in question 1.

1. What type of fall occurred? Chair Equipment Slip Stairs Trip/mis-step Other Unknown

2. Was the employee wearing approved footwear? Yes No Unknown

3. Was the employee wearing slip-resistant shoes? Yes No Unknown

4. Was the employee wearing Yak Trax? Yes No Unknown

5. Upon inspection were there any shoe defects? Yes No Unknown

- a. If yes, select the defect Loose sole Untied laces Other  
Shoe did not meet uniform requirements

6. Any additional Fall Incident comments \_\_\_\_\_

### Complete for all Slips and Falls:

What was the walking surface material? Carpet Grass/dirt Gravel Pavement Tile  
Other Unknown



# Incident Reporting & Response

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**What was the walking surface hazard?** Food/ beverage Grass/gravel/sand Process material  
Snow/ice Water Unknown None

**Complete for all Trip/Mis-step Falls:**

**Was poor housekeeping/ maintenance in the area a factor?** Yes No N/A

**What hazard was involved?** Carrying object Obscured view Obstacle in walkway  
Stepping down Stepping up Uneven surface/ hole Other Unknown None

**Complete for all Stairs Falls:**

**How were the stairs being used?** Climbing up stairs Descending stairs

**Was there a hazard on the stairs?** Yes No

**Was the employee holding the handrail?** Yes No Unknown

**Was the employee carrying an object on the stairs?** Yes No Unknown

**Complete for all Equipment falls:**

**What type of equipment was involved?** Automobile Bicycle Golf cart Ladder Segway  
Step stool Other Description: \_\_\_\_\_

**Did the employee successfully complete training on the equipment involved?**

Yes No Unknown N/A

**Was all required PPE worn properly?** Yes No Unknown N/A

**Complete for all Chair Falls:**

**What chair hazard was involved?** Broken chair Chair with rollers Leaning back Leaning forward  
Sitting/ standing quickly Using chair inappropriately Wrong chair for task

**Complete for all Other Falls:**

**Were other factors involved?** Assault Illness Previous injury Unknown

Description: \_\_\_\_\_

**Additional information about this fall:** \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

# Incident Reporting & Response

## Tab 07

**Complete this section for all Vehicle/ Transportation Incidents:**

**Was a Motor Vehicle Record (MVR) Report required for this driver?** Yes No Unknown N/A

**If applicable, date of the initial MVR report?** (MM/DD/YY) \_\_\_\_\_

**If applicable, date of last MVR check?** (MM/DD/YY) \_\_\_\_\_

**What was the date that the driver completed Driver Training?** (MM/DD/YY) \_\_\_\_\_

**Was the driver wearing the seatbelt at the time of the incident?** Yes No Unknown N/A

**Does the driver use the company vehicle outside of work?** Less than monthly or never Monthly  
Daily Other Unknown

**What type of vehicle was our driver operating?** Bus Car Golf cart Motor cycle Other  
Further Detail: \_\_\_\_\_

**Who owns the vehicle that our driver was operating?** Client AUS Employee Rental Other

**On what type of property did the incident occur?** Client site Non-client site

**Describe the type of location where the incident occurred:** Private intersection Private parking lot  
Private roadway Other private property Public roadway Public multi-lane roadway  
Public intersection Other public property Other

**How was the vehicle moving at the time of the incident?** Driving forward Driving reverse Parked  
Stopped Other Further Detail: \_\_\_\_\_

**What type of incident occurred?** Struck by animal Struck by person Struck by vehicle  
Struck by weather Struck against animal Struck against equipment Struck against person  
Struck against stationary object Struck against vehicle Struck against other

**What contributing hazards were involved for our driver at the time of the incident** (check all which apply):  
Alcohol/ drug use (including over the counter meds) Fatigue Low light Sun glare Speed  
Weather Other Unknown

**Additional information about this vehicle incident:** \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

# Incident Reporting & Response

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Complete this section for all Assault Incidents:

### Where did the assault of our employee occur?

Public area, not client property	Healthcare Facility ER	Healthcare Facility Waiting Room
Healthcare Facility other indoor	Healthcare Facility outdoor	Retail Property indoor
Retail Property loading dock	Retail Property parking lot	Retail Property parking garage
Retail Property sidewalk	Retail Property other outdoor	AUS office/ venue
Other client location indoor	Other client location outdoor	Unknown

**How did the employee interaction begin with the assailant?** Chose to intervene    Directed to intervene  
Attacked without prior involvement    Went in pursuit of the subject    Other    Unknown  
Further detail: \_\_\_\_\_

**How did our employee approach the assailant?** Approached situation independently  
Approached situation with support    Contacted law enforcement before becoming involved  
No approach – was attacked by surprise    Other    Unknown  
Further detail: \_\_\_\_\_

**Who was the assailant?** Combative patient    Individual    Group    Other    Unknown  
Further detail: \_\_\_\_\_

**Did the assailant brandish/utilize a weapon?** Yes    No

**If yes, what type of weapon?** Hand/foot/other body part    Bat/ blunt object    Knife/sharp object    Gun  
Taser    Pepper Spray    Other  
Further detail: \_\_\_\_\_

**Did our employee brandish/utilize a weapon?** Yes    No

**If yes, what type of weapon?** Hand/foot/other body part    Bat/ blunt object    Knife/sharp object    Gun  
Taser    Pepper Spray    Other  
Further detail: \_\_\_\_\_

**What type of injury to our employee resulted from the assault?** Bitten    Gunshot wound    Stabbed  
Spat on    Struck with hands/body    Struck with object    Other    Unknown  
Further detail: \_\_\_\_\_

**Police Report Number, where applicable:** \_\_\_\_\_

**Additional information discovered about this assault incident:** \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

# Incident Reporting & Response

## Tab 07

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### ROOT CAUSE ANALYSIS QUESTIONING GUIDE - APPENDIX 7.3

Solution Teams can use the questions below to consider a variety of issues which may have contributed to an incident. These questions are a starting point, but Solution Teams are encouraged to consider other potential causes.

Questions are written so that in most cases a “No” answer would indicate a concern and possible cause. Those questions marked with (\*\*) do not follow this rule, and a “Yes” answer would indicate a concern and possible cause.

#### Environment/ Materials

- Was the work environment free from weather hazards?
- Were walking surfaces free from hazards? (debris, uneven, lack of handrail, slick surfaces, etc.)
- Was lighting adequate to walk/ work safely?
- Was housekeeping in good order? (tidiness, cleanliness, and materials/furniture properly placed)
- Was there sufficient work space?
- Was the employee walking/ working in the correct environment?
- \*\* Did the task involve exposure to chemicals, traffic or an emergency situation?
- \*\* Did interaction with a customer/ client/ volatile person contribute to the incident?
- \*\* Did other environmental hazards contribute to the incident?
  - Noise, temperature, air contaminants?
  - Other?

#### Equipment

- Was the correct equipment/ tools (including PPE) used for the task?
- Was the correct equipment/ tools (including PPE) available?
- Was the employee familiar/ comfortable with the equipment/ tools?
- Was there a procedure in place to inspect equipment/tools before use?
- Was the equipment/ tools inspected before use?
- Did the equipment/ tools “pass” the inspection?
- Was the equipment/ tools used properly (as designed/ trained)?
- Were equipment safeguards available/working properly at the time of the incident?
- Was necessary/required preventative maintenance completed on equipment/ tools?
- \*\* Were there other equipment/ tool factors that may have contributed to the incident?

#### Process/ Management

- Has a Job Safety Analysis been completed for the post/ task?
- Were the hazards related to this incident identified on the JSA and adequately mitigated?

# Incident Reporting & Response

## Tab 07

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- Was the safe work procedure defined and communicated to the involved employee(s)? (JSA Acknowledgement)
- Was training for this task available and completed?
- Did the training effectively provide the employee with the necessary knowledge/skill to work without incident?
- Was the task within the scope of the contract?
- Did the process, including use of equipment/tools, comply with safety manual and manufacturer guidelines?
- Was there a process in place to observe employees completing the task, and coaching provided as needed?
- \*\* Does the process involve ergonomic hazards? (repetition, force, vibration, posture)
- \*\* Did the task involve lifting, pushing, pulling or climbing?
- \*\* Were there other process/ management factors that may have contributed to the incident?

### People

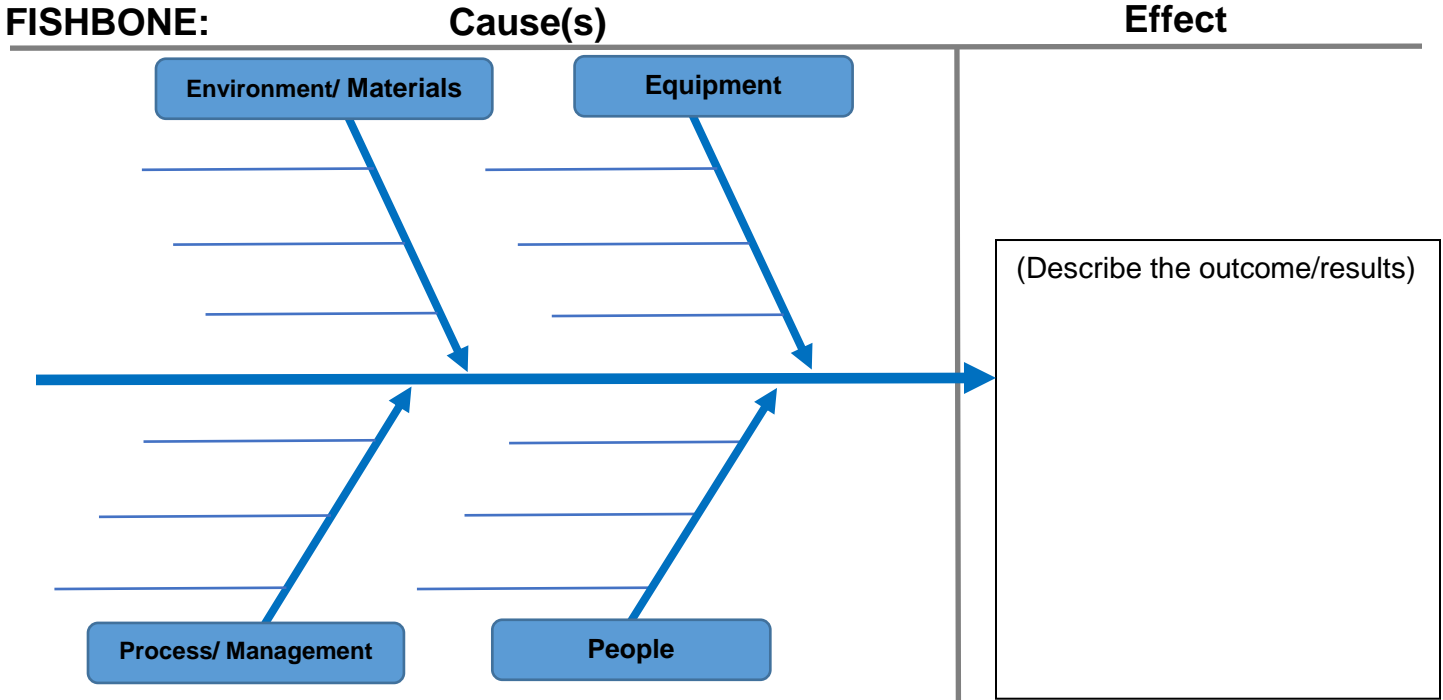
- Did the employee follow all instruction/ procedures related to the task?
- Was the employee able to perform the essential functions of the task?
- Was the employee acclimated to the physical/ environmental demands of the task?
- \*\* Did rushing, shortcut, distraction, stress or multitasking contribute to the incident?
- \*\* Were there other people factors that may have contributed to the incident?

# Incident Reporting & Response

## Tab 07

### Root Cause Analysis & Corrective Actions Worksheet – Appendix 7.4

Incident Date:	Incident Title:
Solution Team Members:	



Root Causes:	Fishbone Section:

Corrective Actions:	Assigned to:	Due Date:	Date Completed:
Create a Safety Share for this incident			

# Emergency Action & Fire Protection

## Tab 08

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### **PURPOSE**

The purpose of the Emergency Action and Fire Prevention Plan is to prepare Allied Universal employees for safe a response to emergency situations which may occur at their work site(s).

### **SCOPE**

This Plan applies to all Allied Universal work sites and the types of emergencies which can be reasonably anticipated, in compliance with the requirements of OSHA 29 CFR 1910.38 and 1910.39.

Every Allied Universal work site, where one or more Allied Universal employees work, will maintain site-specific Emergency Action and Fire Prevention plans.

### **RESPONSIBILITIES**

It is the responsibility of each site or area manager to verify that a written emergency action plan and a fire prevention plan exist for their site, are available to employees, and each employee is trained as to their duties and responsibilities in the plan.

Each site or area manager is responsible to ensure that our employees are trained to assist in the safe and orderly evacuation of employees in the event of an emergency. This role may be filled by Allied Universal personnel or host-client personnel.

### **PLAN**

Every Allied Universal work site, where one or more Allied Universal employee works, will utilize site-specific Emergency Action and Fire Prevention plans. These plans will be in writing and a hard-copy (printed) version will be available for employees to review at the work site.

At client-operated locations Allied Universal may utilize the client's version of the Emergency Action and/or Fire Prevention Plans only when ALL of the following criteria are met:

- The client plan(s) include at least all of the elements required by this guidance.
- The written client plan(s) are printed and accessible to Allied Universal employees for review.
- Allied Universal employees are trained to the requirements of the client plan(s) initially upon hire and when there are changes to the plan.
- The client plan(s) include instructions that apply directly to Allied Universal personnel.

Where the written client plan(s) instructions differ from the instructions/responsibilities of Allied Universal personnel, a separate Allied Universal Emergency Action and/or Fire Prevention plan(s) must be created. Site specific Emergency Action and Fire Prevention plan(s) may be written as one combined document or two separate documents.

# Emergency Action & Fire Protection

## Tab 08

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### Minimum required elements of an Emergency Action Plan:

- Emergency Response Equipment
- Procedures for reporting a fire or other emergency.
- Emergency exit procedures and emergency exit route assignments.
- Procedures to be followed by all employees who remain to perform critical site operations before they evacuate.  
Procedures to account for all employees following an evacuation
- Rescue and medical duties for those employees who are to perform them.
- Names or regular job titles of persons or Sites who can be contacted for further information or explanation of duties under the Emergency Action Plan.

The minimum required elements of a Fire Prevention Plan are:

- A list of potential fire hazards and their proper handling and storage procedures, potential ignition sources (welding, smoking, etc.) and their control measures, and the type of fire protection equipment or systems which can control a fire involving them.
- Procedures to control accumulations of flammable and combustible waste materials.
- Procedures for regular maintenance of safeguards installed on heat-producing equipment to prevent the accidental ignition of combustible materials.
- Names or regular job titles of those responsible for the maintenance of equipment and systems installed to prevent or control ignition of fires.
- Names or regular job titles of those responsible for the control of fuel source hazards.

Appendix 8.1 to this manual tab is a sample “Emergency Action & Fire Prevention Plan that can be used as a model for documenting your plan.

### TRAINING

The site manager will review the following with all employees:

- Types of potential emergencies
- Evacuation plans
- Alarm systems
- Reporting procedures
- Portable Fire Extinguisher training (as detailed in Tab 4 of the Safety Manual)
- Shutdown procedures (if applicable)

The above described employee training will be completed by all Allied Universal employees, and documented by the site manager:

- Initially upon assignment to the site
- At least annually and when the plan is developed
- When changes are made to the plan, equipment, procedures, and/or
- When the employees’ role in the plan changes



# Emergency Action & Fire Protection

## Tab 08

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### Emergency Response Equipment

#### Listing Types of Emergency Equipment

Each site's Emergency Action Plan shall identify the location of emergency equipment. Operational procedures for the use of this equipment will be maintained onsite, reviewed in training and accessible to employees. Available emergency equipment should be identified and reviewed with workers prior to commencing work activities. Examples include, but are not limited to:

- Sites with an audible alarm and a fire hose cabinet.
- Emergency lighting and exit doors.
- First aid kit(s) location at job site/facility and in vehicles.
- Portable fire extinguishers location throughout the facility, clearly marked.
- List of personnel authorized and trained to operate emergency equipment.

### Media Response Plan

In the event of an emergency situation, Allied Universal (AU) employees shall not be interviewed by media unless the Legal Department has given prior approval.

AU personnel shall not agree to a work related interviews, affidavits, written or recorded statements, or depositions without the express approval from Allied Universal's Legal Department. All media requests should be referred to the AU public relations team.

### Media Response Training

- Allied Universal management shall ensure that contractors/consultants working in areas under the supervision of Allied Universal also receive the Emergency Action Plan orientation upon arrival to the area.
- Employees expected to perform duties under the Emergency Action Plan will be trained prior to assuming their roles. This will include evacuation exercises and regular training, appropriate to the type of rescue or evacuation provided.
- A list of trained staff responders shall be maintained. Include: their name, response function, their work location and what type of equipment they have been trained on.

### Location of Emergency facilities

A list shall be posted in a conspicuous area showing local emergency responders and how to contact them. Examples include:

- Client Emergency Response Department (Initial Responder for All Emergencies If Applicable)
- Local Police, Local Hospital, Poison Center (Poison Response) 1-800-332-1414, etc.

# Emergency Action & Fire Protection

## Tab 08

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### Fire Prevention & Response

Allied Universal shall ensure each Emergency Action Plan provides fire protection and response planning in each site's plan and is utilized during all phases of work. The following shall be included at a minimum:

#### Fire Prevention

- Smoking is not permitted except in designated areas.
- Portable fire extinguishers shall be stationed, inspected and maintained in accordance with local fire code and regulations. Allied Universal personnel shall be trained in their use where applicable.
- Flammable and combustible liquids shall be properly stored by client employees who use them.
- Employees shall report all fire safety issues to their immediate supervisor.

#### Response

In the event of a fire, personnel working at a given site/facility will adhere to the following procedure for their work area:

- Warn others in the immediate area. Notify the appropriate emergency response personnel by phone or radio and pull the nearest fire alarm if available.
- If nearby staff have been trained and authorized, and it is safe to do so, fight the fire using a portable fire extinguisher. Remember, if in doubt get out.
- Employees shall use a maximum of one portable extinguisher to fight a fire before escaping.
- Evacuate the premises via the nearest exit and proceed to the nearest Emergency Assembly Area.
- Re-enter only after the Emergency Coordinator has given an ALL CLEAR.

#### Alarm & Emergency Communication

Each Emergency Action Plan shall contain methods to address alarms and communications in case of an emergency. The method of emergency notification should be identified and reviewed with workers prior to commencing work activities.

#### Alarm System

A system must be in place to alert employees. The alarm system shall be distinctive and recognizable as a signal to evacuate the work area or perform actions designated under the emergency action plan. For sites with 10 or fewer employees, direct voice communication is an acceptable procedure for sounding the alarm provided all employees can hear the alarm. Emergency Response plans will describe how to activate an alarm and what to do after either activating or hearing an alarm.

Personnel responding to any alarm shall avoid complacency. Every alarm should be treated as an actual incident until proven otherwise. Treating and responding to alarms as a routine happening can result in injuries, fatalities and property loss.

# Emergency Action & Fire Protection

## Tab 08

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### **Communications**

- Allied Universal responders use telephones (landline), cell phones and radios to communicate. Effective communications must be maintained between the employees engaged in rescue or evacuation and support persons.

### **Procedures for Rescue and Medical Services**

The Emergency Action Plan shall address who performs rescue services when required. It is the position of Allied Universal that all rescue and medical duties are performed by client emergency responders or local governmental responders when on their location, unless otherwise specified in the service contract. For off-site locations, evacuation procedures and methods of rescue shall be identified and reviewed with workers prior to commencing work activities.

### **Preparation for Evacuation**

The Emergency Action Plan shall contain a procedure for evacuation if required. Clients may designate an emergency coordinator.

### **Evacuation Drills**

Evacuation drills shall be conducted at least annually. Before conducting an evacuation drill a pre-drill assessment of the evacuation routes and assembly points shall be conducted. The pre-drill assessment is intended to verify that all egress components (stairs, doors, etc.) are in proper order and that occupants can use them safely.

### **Coordination within a Facility**

Emergency training and drills should also be coordinated with the client so that key staff are involved in the planning process and are aware of their responsibilities in an emergency as well as during the drill.

Facility management needs to be informed of the potential for the interruption in productivity and business operations. Alternatives for the continuity of critical operations need to be considered.

### **Procedures to Account for All Employees After Evacuation**

The emergency action plan must include procedures to account for all employees after an evacuation. This may be handled by the client, unless otherwise specified in our contract. An emergency action plan must include at a minimum procedures to account for all employees after evacuation to verify all employees are accounted for.

### **Emergency Evacuation Notification and Routes**

In the event of an emergency occurring within or affecting the work site, the Emergency Coordinator makes the following decisions and ensures the appropriate key steps are taken:

- Advise all personnel of the emergency.
- Activate the emergency notification sequence to alert the appropriate responders and initiate emergency notification within the building.
- Evacuate all persons to the identified assembly area and account for everyone including visitors and clients.

# Emergency Action & Fire Protection

## Tab 08

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- All personnel will proceed to the primary safe area immediately located at the identified emergency assembly area for their location.
- A copy of escape routes shall be posted in all offices, at all alarm stations and at all exits.

### **Sweep Check by ALLIED UNIVERSAL Designated Responders**

- Allied Universal trained responders will establish a safe route that will permit covering the area in the shortest time.
- If you encounter smoke or flame, leave the area immediately and evacuate the building. Remember, if in doubt get out.
- If anyone refuses to leave, note their name and location, and advise the client's management and/or emergency coordinator.
- Ensure that everyone stays at the emergency assembly area until the Emergency Coordinator has given an all clear to re-enter the building.
- In the event of inclement weather, the client will make arrangements for temporary shelter and/or transport personnel to another location.

### **Emergency Response Program Management**

Contact information will be provided to employees who need additional information pertaining to the plan or to their respective duties. The Allied Universal site manager may be contacted by employees who need more information about the plan or an explanation of their duties under the plan.

For the purpose of these Emergency Action Plan guidelines the Emergency Coordinator will be designated by the client. His/her alternate will be will also be identified in the plan.

Employees performing rescue or evacuation must wear personal protective clothing and equipment appropriate to the hazard(s) they will likely encountered.

# Emergency Action & Fire Protection

## Tab 08

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### EXAMPLE EMERGENCY ACTION PLAN - APPENDIX 8.1

*How to call for emergency fire responders:*

---

*How to call for emergency medical responders:*

---

*Site address to provide to responders:*

---

*Emergency signal:*

---

*Signaled by whom and in what circumstances:*

---

---

*Employee actions upon hearing signal:*

---

---

*How employees are advised of escape routes (these should be posted as a map):*

---

---

*Evacuation procedures and gathering point:*

---

---

*Headcount procedure:*

---

---

*Procedures for employees assigned to rescue and first aid:*

---

---

*Individuals qualified to provide first aid and aid in rescue:*

---

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*Persons who can be contacted in an emergency (include office and 24-hour telephone numbers)*

*Name:*

*Office & 24-Hour Contact Numbers:*

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# Emergency Action & Fire Protection

## Tab 08

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Potential fire hazards:

---

---

Fixed fire protection equipment/maintenance schedule\*:

Type of equipment/location(s):

Maintenance/inspection

---

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---

Portable fire extinguishers\*:

Description/location(s):

Maintenance/inspection

---

---

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*\*Note: For Portable Fire Extinguishers and Fixed Fire Equipment maintained by the client, the maintenance/inspection details need not be documented on this Allied Universal-specific plan.*

*The maintenance/inspection details for any such equipment maintained by Allied Universal will be documented here. All portable fire extinguishers will undergo a monthly visual inspection and annual maintenance check.*

Description of procedures (housekeeping or otherwise) to prevent accumulation of hazardous or combustible materials:

---

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---

Description of fire hazards of workplace materials:

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Employees Responsible for Minimizing Fire Hazards by Inspections/Work Area Policing:

Name:

Area:

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# Emergency Action & Fire Protection

## Tab 08

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DESCRIPTION OF TRAINING PROVIDED

*General employees:*

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*Emergency responders:*

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*Designated emergency responders:*

*Name:*

*Area:*

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**Management Approval:**

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**Date:**

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# Fall Prevention

## Tab 09

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### **PURPOSE**

Slips, trips, and falls are a common risk faced by Allied Universal (AUS) employees. This document outlines expectations for Allied Universal management, supervisors and security professionals on how to prevent hazardous conditions or practices that could result in slips, trips or falls.

### **SCOPE**

This section applies to the environments where AUS employees work and the work tasks AUS employees perform. The application of this section is not intended to, or adequate to, more broadly apply as a hazard assessment tool for the clients' worksite.

### **RESPONSIBILITIES**

#### **Site management is responsible to:**

- Conduct routine inspections of all walking and working surfaces to identify, eliminate, guard or warn of slip, trip and fall hazards in the work environment of Allied Universal employees.
- Utilize the Job Safety Analysis process to identify, document and implement protective measures to prevent fall incidents.
- Promptly and proactively address with the client identified hazards which are beyond the control of Allied Universal.
- Conduct training for employees who use ladders or other elevated work surfaces.
- Work to eliminate or minimize the use of ladders, elevated platforms and roof access as much as feasible for all Allied Universal jobs.
- Provide proper ladders in a safe condition for assigned employee tasks.
- Provide adequate fall prevention and arrest equipment, and training specific to the use, inspection and limitations of these devices.
- Define what type(s) of footwear are appropriate for each work task on site, communicate suggestions/requirements to all employees, and monitor for compliance.

#### **Employees have an obligation to:**

- Wear appropriate footwear in accordance with this policy.
- Maintain work areas free from slip, trip & fall hazards.
- Be familiar and comply with the Job Safety Analysis for their work area(s).
- Correct or immediately report slip, trip and fall hazards.
- Use proper ladders for assigned tasks.
- Use supplemental lighting sources (i.e. flashlights) in areas where additional lighting may be needed.
- Conduct routine inspections of ladders, stairs, walking and working surfaces.
- Follow housekeeping program requirements.
- Immediately address spills to warn others of a potential hazard.
- Hold the handrail at all times when traveling up or down a set of stairs, where handrails are available.



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### GENERAL REQUIREMENTS

**Housekeeping:** Good housekeeping, through the avoidance and removal of hazards on walking surfaces, is an essential part of fall prevention. Described here are common situations which could pose a risk on the surfaces where Allied Universal employees work; employees need to be vigilant in their daily activities to look for and respond to these and other potential hazards in the walking and working surfaces in their workplaces.

If/when these housekeeping hazards are encountered, AUS employees should respond by:

- a) Correcting the hazard if it is in their control to do so; for example, move a cord out of a walkway or flatten the curled edge of a rug.
  - b) Reporting temporary conditions to site maintenance/ housekeeping; for example a spill that needs to be cleaned up (follow the post orders for how to make this notification and your role in the immediate response)
  - c) Reporting the hazard to their supervisors to be corrected; for example a hole in a parking lot or a broken stair rail. The supervisor is then responsible to report the hazard in an email to the client.
- All work areas, passageways, storerooms, and service rooms shall be kept clean and orderly and in a sanitary condition.
  - The floor of every area shall be maintained in a clean and, so far as possible, a dry condition. Where wet processes are used, drainage shall be maintained and gratings, mats, or raised platforms shall be provided. Every floor, work area and passageway shall be kept free from protruding nails, splinters, holes, or loose boards.
  - Aisles and passageways shall be kept clear and in good repair with no obstruction across or in aisles that could create a hazard.
  - Where mechanical handling equipment is used, aisles shall be sufficiently wide. Improper aisle widths coupled with poor housekeeping and vehicle traffic can cause injury to employees, damage the equipment and material, and can limit egress in emergencies.

### Floor Holes & Openings:

- Floor openings and holes, wall openings and holes, and the open sides of platforms may create hazards which may be present in construction sites as well as in existing work areas. People may fall through the openings or over the sides to the level below. The supervisor is responsible to be familiar with all such hazards in their employee's work environment, whether temporary or permanent, and include any such hazards in the post Job Safety Analysis.
- Floor openings may be covered rather than guarded with rails. When the floor opening cover is removed, a temporary guardrail shall be in place, or an attendant shall be stationed at the opening to warn personnel.
- Every floor or hole into which persons can accidentally walk shall be guarded by either: a standard railing with toe boards, or a floor hole cover of standard strength and construction.
- While the cover is not in place, the floor hole shall be constantly attended by someone or shall be protected by a removable standard railing.

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### Elevated Floor/Platforms & Runways:

- Every open-sided floor or platform 4 feet or more above adjacent floor or ground level shall be guarded by a standard railing on all open sides, except where there is an entrance to a ramp, stair way, or fixed ladder. The railing shall be provided with a toeboard wherever, beneath the open sides: persons can pass, there is moving machinery, or there is equipment with which falling materials could create a hazard.
- Every runway shall be guarded by a standard railing, or the equivalent, on all sides 4 feet or more above floor or ground level. Wherever tools, machine parts, or materials are likely to be used on the runway, a toeboard shall also be provided on each exposed side.

### Roofs & Elevated Surfaces:

Allied Universal managers and supervisors should make all reasonable efforts to avoid work tasks on roofs or elevated surfaces. When work tasks in these areas are required by contractual agreement and cannot be avoided, the frequency of these tasks should be limited and the work closely monitored for fall prevention.

- No employee shall access a roof unless given permission by his/her immediate supervisor.
- If the roof is accessed via a ladder, the ladder shall be inspected before use and AUS employees will inspect their footwear before climbing up and down the ladder to verify that their shoes/boots are secure and that the soles are not wet or greasy. Items may not be carried in one's hand while climbing up or down the ladder.
- If the roof or elevated surface is greater than 10 foot above a lower working surface, the employee must be provided with and use fall protection. Fall protection will generally be in the form of guardrails or a personal fall arrest system (full body harness and lanyard).
- All personal fall arrest system equipment utilized by employees must be compliant with applicable ANSI requirements. The employee must receive specific training on how to fit, use, and inspect the personal fall arrest system provided prior to task assignment.
- The roof must have standard guardrails surrounding the perimeter of the area being accessed without a personal fall arrest system.

### Stairways:

Stairways are found in every workplace and are a common fall hazard, even when maintained in a safe condition. All AUS employees are expected to use the following measures to prevent falls on stairways:

- Hold the handrail at all times, whether traveling up or down the stairs, whenever a handrail is available.
- Avoid rushing on the stairs.
- Avoid using the stairs when carrying items which could hinder your balance or view of the stairs.
- Promptly address any slip or trip hazards found on the stairs or the upper or lower landings.

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### Portable Ladders:

A poorly designed, maintained, or improperly used ladder may become unstable or collapse under the load placed upon it and cause the employee to fall. Site managers are expected to eliminate or minimize the use of ladders by AUS employees as much as feasible.

Even a good ladder can be a serious safety hazard when used by workers in a dangerous way. Proper use of ladders is essential in preventing accidents. All employees who use ladders as part of their job duties will receive Ladder Safety Training prior to task assignment. Employees are required to follow the safety measures described in the training to reduce the risk of a fall.

The following requirements must be met when using a portable ladder:

- Ladders shall be used in accordance with the manufacturer's specifications; the maximum load capacity shall not be exceeded.
- Portable ladders longer than 20 feet shall not be used.
- Stepladders shall be equipped with a metal spreader or locking device of sufficient size and strength to securely hold the front and back sections in open position.

Ladders shall be maintained in good condition at all times. Ladders shall be inspected before each use and those which have developed defects shall be withdrawn from service for repair or destruction and tagged or marked as "Dangerous, Do Not Use." Ladders with damage that is beyond repair will be destroyed for disposal as soon as possible.

- Ladders shall be placed with a secure footing, or they shall be lashed, or held in position.
- Ladders used to gain access to a roof or other area shall extend at least 3 feet above the point of support.
- The foot of a straight or extension ladder shall, where possible, be used at such a pitch that the horizontal distance from the top support to the foot of the ladder is one-quarter of the working length of the ladder (the length along the ladder between the foot and the support).
- The worker shall always face the ladder when climbing up or down.
- Short ladders shall not be spliced together to make long ladders.
- Ladders shall never be used in the horizontal position as scaffolds or work platforms.
- The top of a regular stepladder shall not be used as a step.
- Use both hands when climbing and descending ladders.
- Metal ladders shall never be used near electrical equipment.

### Fixed Ladders:

A fixed ladder is a ladder permanently attached to a structure, building or equipment. Fixed ladders between 20-30 feet to a maximum unbroken length shall be equipped with cages or a ladder safety device. A "cage" is a guard that is fastened to the side rails of the fixed ladder or to the structure to encircle the climbing space of the ladder for the safety of the person who must climb the ladder. Cages shall extend a minimum of 42 inches above the top of a landing, unless other acceptable protection is provided. Cages shall extend down the ladder to a point between 7 to 8 feet above the base of the ladder.

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### Footwear:

The design of a shoes/boots and its sole is an important aspect of fall prevention. All AUS employees at client sites shall follow these requirements for their shoes/boots to prevent fall injuries:

- All Security Professionals will wear shoes with a rubber textured sole that secure to the foot, with closed toes and closed heel.
- Where employees are required to walk outdoors in inclement weather conditions (snow, ice, rain) the site will establish a requirement for footwear with a slip-resistant sole. If the site
- specifies which product(s) must be worn by the employee, then the site management is responsible to purchase the footwear to provide to the employee for use (no financial contribution by employee).
  - Supplemental over-shoe anti-slip products may be worn on the outside of a shoe to provide additional traction in certain circumstances. Managers may utilize such products which are recommended by the Risk Management department, in accordance with the safe use measures provided in training, or may choose alternative products. Managers are encouraged to contact the Risk Management department before selecting alternative products, for a risk review.
- Where employees are required to walk on uneven surfaces, such as an unpaved grassy area, the use of high-top boots is recommended to protect ankle stability and prevent falls.
- Where employees are required to climb ladders, the site will establish a requirement for shoes with a defined heel sole, to prevent slipping while climbing or descending rungs. A defined heel is defined as the sole of the shoe/boot coming to a distinct angle at the front of the heel portion of the sole. See graphic below:



**Defined Heel (acceptable for ladder climbing)**



**Non-defined Heel (unacceptable for ladder climbing)**

- Employees who work outdoors in environments where snow or ice conditions may be present, supplemental over-shoe anti-slip products may be used over the outer shoe to increase traction and prevent slips.

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### TRAINING

Site Management is responsible to provide the following training to security officers:

- Upon assignment to a new post, the site management will review the post-specific Job Safety Analysis (JSA) with each new or transferred security officer. The JSA process is used to identify and address hazards in the workplace, including fall prevention.
- Employees assigned to wear supplemental over-shoe anti-slip products will complete training on the products prior to use.
- Where ladders are used for job tasks, employees who use ladders shall complete Ladder training on the Allied Universal|EDGE.

### Safety Training:

- Where elevated platforms or vehicle-mounted elevating or rotating platforms are used for job tasks, site management will supply training to meet OSHA (1910.67) requirements and manufacturers specifications.
- Where fall arrest systems, fall protection, warning lines, or other fall prevention products are utilized by employees the site management will supply training to meet OSHA requirements and manufacturers specifications.

### Retraining on the above topics may be provided as needed when:

- Changes in the workplace, equipment or policy described in this section,
- When new hazards arise or are identified,
- When employees do not understand or are unclear about the requirements of this section,
- When at-risk behaviors or failure to comply with requirements is observed.

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Upon completion of each section, this document becomes the  
**Site-specific Heat Illness Prevention Plan for:**

Job Name:

Job Number:

### POLICY STATEMENT

Allied Universal management at sites where employees work outdoors (posts or patrols) will work to prevent heat illness, and plan for an appropriate response to instances of employee heat illness, through implementation of the measures described in this Heat Illness Prevention Plan (HIPP).

### SCOPE

This plan is mandatory and must be implemented on a site-specific basis at all sites where Allied Universal employees perform work tasks outdoors.

Elements described in each section of this document are designated as either mandatory at all sites, mandatory in California but optional at other sites, or as optional at all sites. The site will implement any mandatory elements and indicate with a check mark which optional elements will be included in the site plan.

OSHA Heat Application: All Allied Universal mobile devices are equipped with the OSHA- NIOSH Heat Safety Tool. Use of this tool will assist Account Managers and all site personnel in managing heat related safety concerns.

The text for elements which will not be implemented as part of the site-specific Heat Illness Prevention Plan will be deleted or crossed out (use font strike through) to prevent confusion about the plan.

### OBJECTIVE

Document a site-specific plan for how Allied Universal management will reduce the risk of and respond to any incidents of employee heat illness.

1. Enable operators in California to comply with the requirements of Cal/OSHA Title 8 Regulation 3395: Heat Illness Prevention.

### RESPONSIBILITIES

Complete this table by adding the name(s) and method to contact of these individuals for the site:

TITLE	NAME(S)	HOW TO CONTACT
Branch Manager/ Client Value Manager:		
Site Manager:		
Supervisor(s):		
First Aid Responder(s):		

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The **Branch Manager/ Client Value Manager** is responsible to:

- Verify that a site-specific Heat Illness Prevention Plan has been developed for each site and is made available to all affected employees as required.
- Verify that the annual audit is completed/documented in April and that any associated action items are resolved in a timely manner.

The **Site Manager/Supervisor** is responsible to:

- Complete all elements to personalize this document as the site-specific Heat Illness Prevention Plan. Make updates to the plan as needed when personnel named in the plan or procedures change.
- Communicate the elements of this plan and make a copy of this plan accessible to all employees at the site.
- Provide effective means of communication needed to contact emergency services.
- Provide training to all employees and supervisors to meet the requirements described herein.
- Provide for access to water, shade, preventative cool-down periods, weather monitoring, reminders of plan elements and heat precautions, and emergency response procedures as described herein.
- Encourage employees to consume more water during hot weather.

**Employees** are responsible to:

- Complete the required training as described in this plan.
- Notify their manager/supervisor if they experience signs of heat illness.
- Notify their manager/ supervisor if they need water or a preventative cool-down period.

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### I. DEFINITIONS

**Acclimatization** - temporary adaptation of the body to work in the heat that occurs gradually when a person is exposed to it.

**Heat Illness** - a serious medical condition resulting from the body's inability to cope with a particular heat load, and includes heat cramps, heat exhaustion, heat syncope and heat stroke.

**Heat Wave** - (per California definition) a Heat Wave is any day in which the predicted high temperature exceeds 80°F AND is at least 10° higher than the average high daily temperature in the preceding five days. In all states outside of California, a heat wave is recognized as period of three or more consecutive days in which the high daily temperature reaches or exceeds 90°F.

**Environmental Risk Factors for Heat Illness** - working conditions that create the possibility that heat illness could occur, including air temperature, relative humidity, radiant heat from the sun and other sources, conductive heat sources such as the ground, air movement, workload severity and duration, protective clothing and personal protective equipment worn by employees.

**OSHA-NIOSH Heat Safety Tool** - The OSHA-NIOSH Heat Safety Tool is a resource for planning outdoor work activities based on how hot it feels throughout the day. Featuring real-time heat index and hourly forecasts, specific to your location, as well as occupational safety and health recommendations from OSHA and NIOSH.

**Personal Risk Factors for Heat Illness** - factors such as an individual's age, degree of health, acclimatization, water consumption, alcohol consumption, caffeine consumption, and use of prescription medications that affect the body's water retention/ other physiological responses to heat.

**Preventative Cool-down Period** - a period of time, no less than 5 minutes in duration, for an employee to drink water and sit in the shade or air conditioning to recover from symptoms of heat illness.

**Shade** - blockage of direct sunlight. Shade is not adequate when objects in the shaded area cast a shadow or when heat in the area of shade defeats the purpose of shade, which is to allow the body to cool. Shade may be provided by any natural or artificial means that does not expose employees to unsafe or unhealthy conditions. Note: The interior of a vehicle may not be used to provide shade unless the vehicle is air-conditioned and the air conditioner is on.

**Temperature** - the dry bulb temperature in degrees Fahrenheit obtainable by using a thermometer to measure the outdoor temperature in an area where there is no shade. While the temperature measurement must be taken in an area with full sunlight, the bulb or sensor of the thermometer should be shielded while taking the measurement, e.g., with the hand or some other object, from direct contact by sunlight.



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### II. MANDATORY MINIMUM REQUIREMENTS FOR CALIFORNIA SITES

**All managers and supervisors in California** will follow these four steps to prevent heat illness: The OSHA- NIOSH Heat Safety Tool **shall** be used by all site personnel to monitor site conditions, warning information and recommended actions based on real time heat conditions.

#### 1. Procedures for Provision of Water

Employees shall have access to potable drinking water meeting the requirements of Sections 1524, 3363, and 3457, as applicable, including but not limited to the requirements that it be fresh, pure, suitably cool, and provided to employees free of charge. The water shall be located as close as practicable to the areas where employees are working. Where drinking water is not plumbed or otherwise continuously supplied, it shall be provided in sufficient quantity at the beginning of the work shift to provide one quart per employee per hour for drinking for the entire shift.

- 1) At the beginning of each shift, all employees who work outside when environmental risk factors for heat illness are present shall have sufficient quantities and immediate access to at least one (1) quart of potable drinking water per hour for the entire shift (at least two (2) gallons of potable water per person per eight-hour shift).
- 2) Smaller quantities may be provided if the Branch has an effective procedure for replenishment that meets the above quantity and time requirements.
- 3) Water must be fresh, pure, suitably cool and located as close as practicable to where employees are working, with exceptions made only when infeasibility can be demonstrated by the employer.
- 4) The importance of frequent drinking water shall be conveyed and encouraged as described in the training section.

#### 2. Procedures for Access to Shade

- 1) Shade **shall** be present when the temperature exceeds 80 degrees Fahrenheit. When the outdoor temperature in the work area exceeds 80 degrees Fahrenheit, the employer shall have and maintain one or more areas with shade at all times while employees are present that are either open to the air or provided with ventilation or cooling. Shade structures must be erected if there are no other sources of shade readily available.
- 2) Even when the temperature does not exceed 80 degrees F, shade or timely access to shade must be provided upon request. When shade from a nearby site is not readily available or accessible, shade structures will be opened and placed as close as practical to the employees. Note: The interior of a vehicle may not be used to provide shade unless the vehicle is air-conditioned and the air conditioner is on.
- 3) Access to shade shall be made available at all times to any employee experiencing heat illness, symptoms of heat illness, or believing a preventative recovery period is needed. Employees with symptoms must be provided appropriate first aid or emergency response.

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- 4) The preventative recovery period shall be at least five (5) minutes. Employees taking a preventative cool down rest must be monitored for symptoms of heat illness, encouraged to remain in the shade, and not ordered back to work until symptoms are gone.
- 5) Water shall be made available in the shade/preventative recovery period area.
- 6) When temperatures equal or exceed 80 degrees F or during a heat wave, adequate shade must be provided to accommodate all employees on recovery or rest periods, and those onsite taking meal periods.

### 3. Procedures for Monitoring the Weather

- 1) To identify if environmental risk factors are present, the Branch shall obtain temperature and humidity measurements for the work areas, either by direct measurements or by weather forecasts that are adjusted to match worksite conditions.
- 2) The OSHA- NIOSH Heat Safety Tool **shall** be used by all site personnel to monitor site conditions, warning information and recommended actions based on real time heat conditions.
- 3) To evaluate if an environmental risk factor is present, the Branch shall obtain the Heat Index, calculated by the National Weather Service, to rate the risk of heat illness depending on air temperature and humidity. The Branch shall assume there is a significant risk of heat illness when the Heat Index for an employee working in the sun is 80 or above, and 90 or above when employees are working in the shade. If workers are wearing more than "light" clothing, the risk of heat illness shall be considered significant at a lower Heat Index.
- 4) To control and reduce the exposure to environmental risk factors, the Branch shall utilize the following control measures (mark all that apply):
  - Provide shade for work areas
  - Schedule outdoor and/or vigorous work in the cooler hours of the day
  - Schedule more breaks during the day
  - Provide misters or other cooling devices

Other \_\_\_\_\_

### 4. Identifying, Evaluating and Controlling Personal Risk Factors for Heat Illness

The Branch shall train employees on the factors that can affect their vulnerability to heat illness. These factors include an employee's age, level of acclimatization, health, water consumption, alcohol consumption, caffeine consumption, overall health, and use of prescription medications that may alter the body's ability to retain water or otherwise affect its physiological response to heat.

The OSHA- NIOSH Heat Safety Tool **shall** be used by all site personnel to monitor site conditions, warning information and recommended actions based on real time heat conditions.

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III. Procedures for Provisions of Water			
<p>Water consumption is an essential part of any Heat Illness Prevention Plan. All sites shall provide every employee with access to potable water while they work. The importance of drinking water frequently during hot weather, or in hot work environments, will be stressed during HIPP training and at meetings.</p>			
Minimum Requirement at all sites	Required at all CA sites; Optional at other sites	Optional at all sites	Description
✓			All employees will have regular access to potable water that is fresh, pure and provided at no cost to the employee. <i>Select which method will be used at this site to make water available (must check either A or B).</i>
<input type="checkbox"/> All sites must select either A or B			<b>A:</b> Employees will have regular access to a plumbed potable water source, such as a water fountain or kitchen faucet, to consume water or refill personal drinking containers. Restroom faucets may NOT be used as a source of drinking water. (** If hoses and connections are used, they must be governmentally approved for potable drinking water systems, as shown on the manufacturer's label.)
<input type="checkbox"/> All sites must select either A or B			<b>B:</b> Employees will be provided with containers of potable drinking water, as described below (must check either B-1 or B-2). Water shall be located as close as practical to the areas where employees are working, as well as to designated shade/ rest areas.
		<input type="checkbox"/>	<b>B-1:</b> Individual-use containers of bottled water will be provided to employees. Efforts will be made to keep water bottles cold in an accessible location. A minimum supply of one quart of water per hour per employee for the entire shift shall be made available.
		<input type="checkbox"/>	<b>B-2:</b> Large shared-use containers of water will be provided to employees. An adequate supply of drinking water, so that at least two quarts per employee are available at the start of the shift and a total of one quart of water per hour per employee for the entire shift shall be

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			<p>made available. When drinking water is supplied in this manner, the following requirements apply:</p> <ul style="list-style-type: none"> <li>➤ An adequate supply of disposable cups for individual use cups will be made available to workers and will be kept clean until used.</li> <li>➤ The water level of the large shared-use container(s) will be checked at least every hour to ensure an adequate supply of drinking water is always available to employees.</li> <li>➤ The water supply will be kept at a temperature cooler than the ambient air temperature, but not so cold as to cause discomfort.</li> <li>➤ The water container will be placed in a location close to outdoor workers.</li> <li>➤ Water containers will be kept in sanitary condition.</li> </ul>
		□	<b>Any additional site-specific measures:</b>

### IV. Procedures for Access to Shade

Exposure to direct sunlight during periods of high heat will increase the risk of heat illness. Employees shall have access to safe spaces for shade.

Minimum Requirement at all sites	Required at all CA sites; Optional at other sites	Optional at all sites	Description
✓			All employees shall have access to shade. Shade must be provided by natural or artificial means that does not expose employees to unsafe or unhealthy conditions, and that does not deter or discourage access or use.
✓			A vehicle may serve as shade ONLY when the air-conditioner is actively cooling the interior of the vehicle.
	□		When the outdoor temperature reaches or exceeds 80 degrees Fahrenheit employees shall have timely access to shade upon request. The shaded space shall be large

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			enough to comfortably accommodate all of the employees who need a preventative cool-down rest period at any given time and during meal periods.
	<input type="checkbox"/>		Employees shall be permitted and encouraged to take a preventative cool-down rest in the shade for a period of no less than five minutes (beyond travel time) to prevent overheating.
	<input type="checkbox"/>		Access to shade will be provided promptly, when requested by an employee. Employees will make such requests by the following means/ procedure:
	<input type="checkbox"/>		The appointed location(s) for access to shade are:
	<input type="checkbox"/>		If a temporary structure is needed for additional or alternative shaded area(s), it will be erected, near the assigned work area(s), at the following location:
	<input type="checkbox"/>		In situations where it is not safe or feasible to provide access to shade (e.g., during high winds), a note will be made of these unsafe or unfeasible conditions, and the alternative measures to be taken to provide shade upon request.
		<input type="checkbox"/>	<b>Any additional site-specific measures:</b>

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V. Weather Monitoring			
Increased temperature and humidity play a role in heat exposure and potential for an employee to experience heat illness. Site managers/supervisors should be aware of predicted weather trends which may pose a risk to employees working outdoors.			
Minimum Requirement at all sites	Required at all CA sites; Optional at other sites	Optional at all sites	Description
✓			During periods of high heat and heat waves reminders about the precautions to be taken to prevent heat illness will be communicated to employees. Employees working outdoors will have means to communicate with others to request access to shade and/or water as needed.
		<input type="checkbox"/>	Employees working outdoors during periods of high heat will be observed periodically for alertness and signs of heat illness.
		<input type="checkbox"/>	During a heat wave employees will be reminded and encouraged to immediately report to their supervisor any symptoms of heat illness that they are experiencing.
	<input type="checkbox"/>		Those who supervise outdoor workers will receive training on how to monitor weather reports and how to respond to hot weather advisories.
		<input type="checkbox"/>	<b>Any additional site-specific measures:</b>

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<b>VI. Acclimatization and Personal Risk Factors</b>			
<p>Inadequate acclimatization can be significantly more perilous in conditions of high heat and physical stress. Employees newly assigned to outdoor work, and all employees working outdoors during a heat wave, may be at an increased risk of heat illness due to significant temperature changes and the stresses to the body.</p>			
<b>Minimum Requirement at all sites</b>	<b>Required at all CA sites; Optional at other sites</b>	<b>Optional at all sites</b>	<b>Description</b>
✓			Supervisors are responsible for the conditions in which their employees work, and must have increase awareness and responsiveness to the risk of heat illness when conditions result in sudden exposure to high heat that employees newly assigned to outdoor work are not used to.
	<input type="checkbox"/>		Supervisors will stay extra-vigilant for the increased risk and response to symptoms of heat illness with all new employees during their first 14 days assigned to a new position working outdoors.
	<input type="checkbox"/>		New employees will be assigned a “buddy” or experienced co-worker to watch each other closely for discomfort or symptoms of heat illness.
	<input type="checkbox"/>		Employees and supervisors will be trained on the importance of acclimatization, how it is developed and how these company procedures address it.
		<input type="checkbox"/>	During periods of high heat the supervisor will determine if temporary changes to the uniform may be made to reduce heat stress. Examples of such changes may include (but are not limited to): - Rolling up long sleeves, unbuttoning the top shirt button(s), loosening the collar - Wearing a hat to protect skin from sun exposure - Wearing a light-colored uniform
		<input type="checkbox"/>	During periods of high heat supervisors may post visual reminders about heat illness prevention plans, personal risk factors and preventative measures for heat illness

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		□	<b>Any additional site-specific measures:</b>
<b>VII. Symptoms of Heat Illness</b> <p>The tables below describe the symptoms which may be exhibited by a person experiencing heat illness and the CDC-recommended steps which should be taken in reaction to illness.</p>			
<b>HEAT CRAMPS: SYMPTOMS</b>		<b>WHAT YOU SHOULD DO</b>	
<ul style="list-style-type: none"> <li>• Muscle pain or spasms, usually in the abdomen, arms or legs</li> </ul>		<ul style="list-style-type: none"> <li>• Stop all activity and sit quietly in a cool place</li> <li>• Drink clear juice or a sports beverage</li> <li>• Notify your manager if you are experiencing symptoms of heat cramps</li> <li>• Seek medical attention for heat cramps if they do not subside in 1 hour</li> </ul>	
<b>HEAT EXHAUSTION: SYMPTOMS</b>		<b>WHAT YOU SHOULD DO</b>	
<ul style="list-style-type: none"> <li>• Heavy sweating</li> <li>• Weakness</li> <li>• Cool, pale and clammy skin</li> <li>• Faint, weak pulse</li> <li>• Nausea or vomiting</li> <li>• Fainting</li> </ul>		<ul style="list-style-type: none"> <li>• Notify your supervisor if you are experiencing symptoms of heat exhaustion</li> <li>• Move to a cooler location</li> <li>• Lay down and loosen clothing</li> <li>• Apply cool, wet clothes to as much of the body as possible</li> <li>• Sip water</li> <li>• If vomiting, promptly seek medical attention</li> </ul>	
<b>HEAT STROKE: SYMPTOMS</b>		<b>WHAT YOU SHOULD DO</b>	
<ul style="list-style-type: none"> <li>• High body temperature (above 103°F)</li> <li>• Hot, red, dry or moist skin</li> <li>• Rapid and strong pulse</li> <li>• Possible loss of consciousness</li> </ul>		<ul style="list-style-type: none"> <li>• Immediately call for emergency medical services (911 in most places)</li> <li>• Move the person to a cooler environment</li> <li>• Reduce the body temperature with cool clothes</li> <li>• Do NOT consume fluids</li> </ul>	

Source, Centers for Disease Control and Prevention:

- <http://www.cdc.gov/nceh/extremeheat/warning.html>
- <http://www.bt.cdc.gov/disasters/extremeheat/faq.asp>



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VIII. Procedures for Emergency Response and Handling of an Ill Employee			
<p>Early symptoms of heat illness, such as heat rash or cramps, can quickly escalate to more severe illness, like heat exhaustion, or a medical emergency involving heat stroke if simple preventative measures are not followed.</p>			
Minimum Requirement at all sites	Required at all CA sites; Optional at other sites	Optional at all sites	Description
✓			<p>A certified and appropriately equipped First Aid provider shall be available to render first aid if necessary. This response may range from drinking water during a preventative cool-down period to summoning emergency medical care.</p> <p>If a First Aid provider is not available on site there will be a process in place from emergency medical services to be summoned if any employee shows symptoms of heat exhaustion or heat stroke.</p>
✓			<p>An effective and reliable process, and associated equipment, shall be provided by management for employees at the site to contact a supervisor, or emergency medical services when necessary, by voice or electronic means in the event of an employee experiencing heat illness.</p>
	☐		<p>Employees working in high heat environments who report that they are experiencing symptoms of heat illness will be given the opportunity to take a Preventative Cool-down Period.</p>
	☐		<p>When an employee requests a Preventative Cool-down Period or reports heat illness, the employee:</p> <ol style="list-style-type: none"> <li>1. Shall be monitored and asked if they are experiencing symptoms of heat illness,</li> <li>2. Shall not be left alone,</li> <li>3. Shall be encouraged to remain in the shade for no less than 5 minutes (in addition to travel time),</li> <li>4. Shall not be ordered back to work until any signs or symptoms of heat illness have abated, and</li> <li>5. Shall not be sent home without being offered onsite first aid and/or being provided with emergency</li> </ol>

# Heat Illness Prevention Plan

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			medical services.
	<input type="checkbox"/>		Emergency medical services will be contacted immediately if an employee experiences signs or symptoms of severe heat illness (such as, but not limited to, decreased level of consciousness, staggering, vomiting, disorientation, irrational behavior or convulsions).
	<input type="checkbox"/>		In the event of an emergency, clear and precise directions to the work site will be provided as needed to emergency responders.
		<input type="checkbox"/>	<b>Any additional site-specific measures:</b>

✓ **List of the name(s) of those on-site who are authorized to provide First Aid:**

**All employees on site are permitted to call directly for emergency medical services, but those listed above are responsible to do so promptly once aware that someone is experiencing signs or symptoms of severe heat illness.**

✓ **How to summon Emergency Medical Services:**

# Heat Illness Prevention Plan

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### IX. Training Requirements

All employees and supervisors will receive training on the risks of heat illness and the site-specific heat illness prevention plan prior to working outdoors in hot weather. Effective training in the following topics shall be provided to each supervisory and non-supervisory employee before they begin work that should reasonably be anticipated to result in exposure to the risk of heat illness.

Minimum Requirement at all sites	Required at all CA sites; Optional at other sites	Optional at all sites	Description
✓			<p>The training program for employees and supervisors will include:</p> <ul style="list-style-type: none"> <li>• The environmental and personal risk factors for heat illness, as well as the added burden of heat load on the body caused by exertion, clothing, and personal protective equipment.</li> <li>• A review of each section of the written site-specific Heat Illness Prevention Plan.</li> <li>• The importance of frequent consumption of small quantities of water, up to 4 cups per hour, when the work environment is hot and employees are likely to be sweating more than usual in the performance of their duties.</li> <li>• The concept and importance of acclimatization.</li> <li>• The different types of heat illness and the common signs and symptoms of heat illness.</li> <li>• The importance to employees of immediately reporting to the employer, symptoms or signs of heat illness in themselves, or in co-workers.</li> <li>• The procedures for responding to symptoms of possible heat illness, including how emergency medical services will be provided should they become necessary.</li> <li>• The procedures for contacting emergency medical services, and if necessary, for transporting employees to a point where they can be reached by an emergency medical service provider.</li> </ul>

# Heat Illness Prevention Plan

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			<ul style="list-style-type: none"> <li>The procedures for ensuring that, in the event of an emergency, clear and precise directions to the work site can and will be provided as needed to emergency responders.</li> <li>The use and application of the OSHA Heat Tool Application for mobile devices</li> </ul>
✓			<p>Additionally, supervisors will be trained prior to being assigned to supervise those who work outdoors. Training will include:</p> <ul style="list-style-type: none"> <li>Instruction on how to implement the site-specific written Heat Illness Prevention Plan</li> <li>Steps supervisors will follow when employees' exhibit symptoms consistent with heat illness.</li> <li>Procedures for calling for emergency medical care.</li> <li>How to track the weather at the job site and how weather information may be used to modify work tasks.</li> <li>The use and application of the OSHA Heat Tool Application for mobile devices.</li> </ul>
		☐	<b>Any additional site-specific measures:</b>
<p><b>X. Program Audit</b></p> <p>An audit of this plan will be completed and documented annually during the month of April to evaluate the effectiveness of the site-specific heat illness prevention plan. The site manager/supervisor will use the 7 questions below to conduct this audit. A corrective action plan will be produced to promptly correct any issues which initially result in a "No" response.</p>			
<b>Minimum requirement at all sites</b>	<b>Audit answer: YES</b>	<b>Audit answer: NO</b>	<b>Assess each question individually and provide a response of YES or NO to each question in the columns to the left.</b>
✓			1. Have all affected Allied Universal employees who work on site completed the HIPP Training?

# Heat Illness Prevention Plan

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✓			2. Have all Allied Universal managers/supervisors on site completed the Supervisor's HIPP Training (in addition to the general HIPP Training)?
✓			3. Does each Supervisor have means to monitor the weather and temperature on site?
✓			4. Is there a certified and equipped First Aid responder on site?
✓			5. Do all Allied Universal employees know how to call for emergency help, if needed?
✓			6. Do all Allied Universal employees working on site have access to cool, fresh potable water at no cost?
✓			7. Do all Allied Universal employees working on site have access to shade?

### Corrective Action Plan

In the event that a NO response is produced in the above annual audit, the following corrective actions will be assigned to an individual with a timeline for completion. The site manager/supervisor is responsible to document the completion of each action item.

**Action Required**

**Assigned To**

**Due Date**

# Hazard Communication

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### **PURPOSE**

The purpose of this program is to provide information, guidelines, and training to our employees regarding the recognition, handling, use, and storage of chemicals or other hazardous materials. This program applies to all employees who may be exposed to a hazardous material under normal conditions of use, or in a reasonably foreseeable emergency situation during work place operations.

### **SCOPE**

To provide a safe workplace and comply with OSHA requirements, Allied Universal and the host employer (client) will use the following methods to prevent injuries and/or illnesses related to potential chemical exposure:

1. Identification of hazardous materials in the work place,
2. Proper labeling of hazardous material containers handled by Allied Universal employees,
3. Access to Safety Data Sheets (SDS) for all known hazardous materials in our work place, and
4. Training of all affected employees on this program.

### **APPLICATION**

This program applies to all security professionals and other Allied Universal Security Services employees who may be exposed to hazardous materials/chemicals in their workplace. The requirements of this program are based on OSHA standards found in 29 CFR 1910.1200 and 8 CCR 5194.

### **REFERENCES**

29 CFR 1910.1200 – OSHA Hazard Communication Regulation

### **RESPONSIBILITIES**

It is the responsibility of site management to implement the requirements as listed in this document and work with the host client to achieve aspects 1-3 as listed in the Scope of this document. Item 4 of the Scope is the direct responsibility of Allied Universal management.

OSHA specifies in 29 CFR 1910.1200(e)(2) that the host employer (client) shall ensure that the hazard communication programs developed and implemented include:

- Methods to provide on-site access to Safety Data Sheets;
- Methods to inform others of necessary precautions to protect employees during normal operating conditions and foreseeable emergencies;
- Methods to inform others of the labeling system used.

Upon notification of a new chemical in the workplace, the manager will review the SDS provided by the client for significant health or safety concerns, such as carcinogenic materials or other highly hazardous substances. Where Allied Universal employees have the potential to be exposed to any such chemicals, employees will be provided with prompt training and the manager will work with the client and Allied Universal management to provide adequate protection from the risks of such substances.

# Hazard Communication

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### WRITTEN HAZARD COMMUNICATION PROGRAM

Each work site will develop, implement and maintain a site-specific written hazard communication program. Allied Universal management may adopt the program prepared by the host employer (client) or may need to produce their own program in situations where:

- The host employer does not maintain a program;
- The host employer's program does not meet the minimum requirements as listed in this section; or
- The host employer does not permit Allied Universal to use their program.

A written hazard communication program must include:

- Container labeling methods and other forms of warnings
- A list of hazardous chemicals known to be present in the workplace
- Safety Data Sheets
- Employee information and training
- Methods used to inform employees of the hazards of non-routine tasks in unlabeled pipes

The hazard communication program will be available on site to employees and their representatives.

### IDENTIFICATION OF HAZARDOUS SUBSTANCES

Our client(s) may have a variety of products in their workplace and some of these products may contain one or more hazardous substances. The client is required to maintain an inventory list of all hazardous materials/chemicals in the workplace, and is responsible to maintain the most current SDS.

All security professionals should be familiar with how to access the list of hazardous substances and corresponding Safety Data Sheets.

### CONTAINER LABELING/ WARNINGS

#### Manufacturer's Containers:

The client will be responsible to properly label all products containing hazardous materials. Chemical labels must clearly and legibly convey in English, prominently on the container, the name of the substance and hazard warnings. Per T8 CCR 5914, clients in California are responsible to periodically audit their system and check that container labels meet these requirements.

Security professionals should be familiar with the following about chemical products in their work environment to which they may be exposed:

- The identity of the product; this may be the common name, the trade name, or the product name as listed on the SDS.
- Written hazard warnings (in English) regarding physical and health hazards of the product.
- How to access the SDS to acquire emergency response information.

# Hazard Communication

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### **Transfer Containers:**

If products containing hazardous materials are transferred into a secondary container (transfer container) which will be stored beyond the immediate use and control of the person performing the transfer, the secondary container must be labeled with the below information:

- Identity of the product; the proper SDS name of the product must be clearly written (in English) and prominently displayed. The common name of the product may be included).
- Written hazard warnings (in English) regarding physical and health hazards of the product.

The client is responsible for the appropriate labeling of all transfer containers produced by their employees or other contractors on site.

Any/all transfer containers produced by Allied Universal employees, which will be stored beyond the immediate use and control of that person, will be labeled in a manner consistent with the format used by the host client and will include the above listed required elements at the time of transfer by the employee in control of the container.

In addition to container labeling, warnings may also be communicated verbally, via training materials, and through signs, placards or other similar methods.

### **SAFETY DATA SHEETS (SDS)**

The Safety Data Sheet is the primary means used to convey necessary information about the potential hazards and emergency response procedures for hazardous chemicals used in the workplace. The manufacturers and distributors of these products are responsible to provide the purchaser with a SDS.

Allied Universal management shall provide all employees with access to the SDS of all products containing hazardous materials that Allied Universal employees may be exposed to in the workplace. In most cases the local manager will need to establish a process with the client to have access to the clients' Safety Data Sheets.

### **TESTING AND MONITORING**

As needed, Allied Universal may monitor the work place as needed to evaluate the effectiveness of engineering controls and occupational procedures to keep exposure levels within acceptable limits.

A Loss Control Consultant using the latest test instruments will do testing and monitoring. The results of these tests will be documented, retained and available to affected employees.

### **TRAINING & INFORMATON**

All employees working for Allied Universal are required to attend any safety training regarding Hazard Communication that is provided by the host employer (client), or equivalent separate training, if hazardous substances are present. The training should be conducted initially upon assignment and any time a new chemical is introduced to the work environment. At minimum the training shall contain the following information:



# Hazard Communication

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- The requirements of the OSHA Standard
- Any operations in their work area where hazardous chemicals are present
- The location and availability of the written hazard communication program, including lists of hazardous chemicals and how to access material safety data sheets
- Methods to detect the presence or release of a hazardous chemical in the work area
- Emergency procedures, including:
  - The location of suitable facilities for quick drenching or flushing of eyes or body within the work area for response to exposures of corrosive materials
  - Emergency procedures detailed on the SDS
  - The employee's role in the event of an evacuation
  - Who to contact in the case of an accidental release of the material
- The physical and health hazards of the chemicals in the work area through review of the SDS information, including:
  - Emergency and First Aid procedures
  - How to read precautionary labels
- The measures employees can take to protect themselves from these hazards, including specific procedures which have been implemented to protect employees. This will include information about Personal Protective Equipment (PPE) to be utilized by employees, including:
  - What PPE should be used
  - When and how to properly use the PPE
  - The limitations of the PPE
  - Where to acquire the PPE
  - Who to contact for replacement PPE and questions

All employee training sessions shall be documented, including a description of the training content, training date, employee names and/or identification number and the name(s) of the training provider. This documentation shall be maintained in compliance with the Allied Universal records retention policy.

### Non-Routine Tasks

Occasionally, employees are required to perform a non-routine tasks which could involve a potential exposure. Prior to starting work the Supervisor will complete a Job Safety Analysis. Each affected employee will be given information by their supervisor about hazardous chemicals to which they may be exposed during such activity.

### Globally Harmonized System (GHS) of Classification and Labeling of Chemicals

The GHS will provide universal guidelines for chemical hazard communication information. For example, GHS will use pictograms (universal symbols) on all product labels. These pictograms will provide quick and easy hazard recognition.

The GHS standardizes label elements so that they all have the same five basic pieces of information:

- A signal word;
- A hazard statement;

# Hazard Communication

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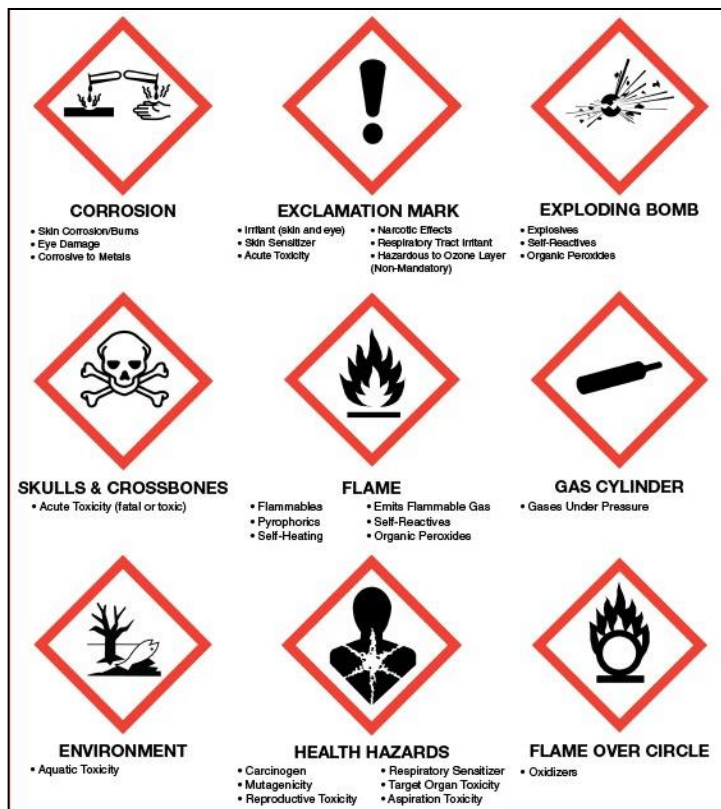
- Precautionary statements;
- A product identifier;
- Name of the manufacturer or supplier.

Labels are required to have:

- Pictograms
- Signal Words
- Hazard Statement
- Precautionary Statements
- Product Identifier
- Supplier Identification
- Supplemental Information (as required)

### Nine pictograms will be utilized in identifying hazards of ALL chemicals

- Each chemical will have AT LEAST one pictogram, often multiple pictograms – to visually convey the hazards associated with it
- We need to be familiar with the meaning(s) of each pictogram
  - Labels and safety data sheets will not always include that information, understanding these is critical
  - Radiological & Environmental Management (REM) will provide pictogram reference cards to post in work areas for future reference



# Hazard Communication

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### Labels - Signal Words

Signal words describe the severity of a hazard:

- **Danger** This is reserved for the more severe hazards
- **Warning** This is used on less severe hazards
- If there is no significant hazard, a signal word won't be used

### Labels - Hazard Statements

Phrases that describe the nature of a hazard:

- Examples:
  - Highly flammable liquid and vapor
  - May cause liver and kidney damage
  - Fatal if swallowed

### Labels - Precautionary Statements

Recommend measures that should be taken to minimize or prevent adverse effects resulting from exposure to the hazardous chemical:

- There are four types of precautionary statements:
  1. Prevention (to minimize exposure)
  2. Response (in case of accidental spillage or exposure)
  3. Storage
  4. Disposal

### Labels - Supplier Information

- Name
- Address
- Telephone Number

### Labels - Supplemental Information

- The supplier may provide additional instructions, expiration date, fill date or information that it deems helpful.
- An example is the personal protective equipment (PPE) pictogram indicating what to wear.

# Hazard Communication

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### Labels - Examples of PPE pictograms



### Label Examples:

SAMPLE LABEL	
CODE _____ Product Name _____	<b>Product Identifier</b>
Company Name _____ Street Address _____ City _____ State _____ Postal Code _____ Country _____ Emergency Phone Number _____	<b>Supplier Identification</b>
Keep container tightly closed. Store in a cool, well-ventilated place that is locked. Keep away from heat/sparks/open flame. No smoking. Only use non-sparking tools. Use explosion-proof electrical equipment. Take precautionary measures against static discharge. Ground and bond container and receiving equipment. Do not breathe vapors. Wear protective gloves. Do not eat, drink or smoke when using this product. Wash hands thoroughly after handling. Dispose of in accordance with local, regional, national, international regulations as specified.  <b>In Case of Fire:</b> use dry chemical (BC) or Carbon Dioxide (CO <sub>2</sub> ) fire extinguisher to extinguish.  <b>First Aid</b> If exposed call Poison Center. If on skin (or hair): Take off immediately any contaminated clothing. Rinse skin with water.	<b>Precautionary Statements</b>
<b>Hazard Pictograms</b> 	
<b>Signal Word</b> <b>Danger</b>	
Highly flammable liquid and vapor. } <b>Hazard Statements</b> May cause liver and kidney damage. }	
<b>Supplemental Information</b> <b>Directions for Use</b> _____ _____ _____ Fill weight: _____ Lot Number: _____ Gross weight: _____ Fill Date: _____ Expiration Date: _____	

### Secondary Labels

- Whenever a chemical is taken from its original container, the container it is transferred into must have a secondary label affixed to identify its contents

# Hazard Communication

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### GLOSSARY

**Absorption** - The movement of a hazardous material through the skin into the bloodstream.

**Acute** - Short-term effect, usually occurs when exposed to a material for a short time.

**Boiling Point** - Temperature at which a liquid becomes a gas.

**Ceiling (C)** - Maximum level of permitted exposure to a material.

**Chronic** - Long-term effect. Low-level exposure to a hazardous material over long periods of time can cause long-term effects.

**Combustible** - A liquid that becomes flammable when it reaches a temperature over 100°F.

**Concentration** - A volume-per-volume relation of concentration.

**Parts Per Million (PPM)** - A quantity of parts of a material per one million parts of another material.

**Evaporation Rate** - The time it takes a given amount of a material to completely dry up, compared to ether, which evaporates very quickly, or to butyl acetate, which evaporates.

**Flammable** - A flammable material will burn in air when ignited.

**Explosive Limits** - Either flammable, combustible, or explosive. When a material LEL – UEL concentration is below the Lower Explosive Limit (LEL), the material is too lean to burn. When the material concentration is above the Upper Explosive Limit (UEL), the material is too rich to burn. The material will burn if the concentration is between the LEL and UEL.

**Flash Point** - The temperature at which a flammable liquid produces enough vapor to burn.

**Ingestion** - Taking the material by mouth, swallowing the material.

**Inhalation** - Breathing vapor or gas from a material.

**Inhibitor** - A chemical which, when added to another, reduces the chance of a reaction.

**Oxidizing Agent** - A material that gives off oxygen in a chemical reaction.

**Polymerization** - A reaction with extremely high or uncontrolled release of energy.

**Reactivity** - The ability of a material to undergo a reaction which releases energy or heat.

**Solubility** - The tendency of a material to dissolve in water or other solvents.

**Stability** - Tendency of a material to resist undesirable chemical changes during storage or transport.

**Threshold Limit Value (TLV) & Permissible Exposure Limit (PEL)** - Both indicate safe exposure levels. The level you can be exposed to without adverse effects.

**Vapor Density** - The weight of vapor compared with an equal volume of air. If less than 1.0, the vapor will rise in air. If greater than 1.0, the vapor will tend to fall in air.

# **EXPOSURE CONTROL PLAN**

## **FOR BLOODBORNE PATHOGENS**



**ACCORDING TO OSHA 29 CFR 1910.1030**

**Revised: September 28, 2016  
Latest Annual Review: April 15, 2019**

### **PURPOSE**

Allied Universal has established this Exposure Control Plan to eliminate or minimize the risk of employee exposure to blood borne pathogens.

### **SCOPE**

This Exposure Control Plan outlines the methods used to protect Security Professionals who may incur exposure to blood or other potentially infectious materials as a result of performing their job duties.

# Bloodborne Pathogens Exposure Control Plan

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### ALLIED UNIVERSAL SECURITY SERVICES

### EXPOSURE CONTROL PLAN

### TABLE OF CONTENTS

Section A	<b>Introduction to OSHA Standard 29 CFR Part 1910.1030</b>
Section B	<b>Exposure Control Plan</b>
	I. Communicating Hazards
	II. Exposure Determination
	III. Compliance Methods
	IV. Hand Washing Facilities
	V. Contaminated Sharps
	VI. Needles
	VII. Splashing Controls
	VIII. Specimens
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	XII. Gloves
	XIII. Masks/Protective Equipment & Clothing
	XIV. Contaminated Surfaces
	XV. Laundry Procedures
	XVI. Regulated Waste Disposal
Section C	<b>Hepatitis B Vaccine</b>
Section D	<b>Exposure Reporting, Evaluation &amp; Follow-up</b>
Section E	<b>Interaction with Healthcare Professionals</b>
Section F	<b>Employee Bloodborne Pathogen Training</b>
Section G	<b>Recordkeeping</b>
Section H	<b>Glossary of Terms</b>
Appendices	12.1 Information on Hepatitis B
	12.2 Hepatitis B Vaccination Form
	12.3 Standard Precautions to Prevent BBP Exposure
	12.4 Exposure Incident Report

# Bloodborne Pathogens Exposure Control Plan

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### SECTION A

#### **INTRODUCTION TO OSHA STANDARD 29 CFR PART 1910.1030**

Acquired Immunodeficiency Syndrome (AIDS) and Hepatitis B merit serious concern for workers who have occupational exposure to blood, other potentially infectious materials, and certain other body fluids that contain bloodborne pathogens such as the human immunodeficiency virus (HIV), and the Hepatitis B virus (HBV). According to Occupational Safety and Health Administration (OSHA) estimates, more than 5.6 million workers in health care and public safety occupations could be potentially exposed to these viruses.

Exposure to bloodborne pathogens may occur in many ways. Although needle stick injuries are the most common means of exposure for health care workers, bloodborne pathogens also can be transmitted through contact with the mucous membranes and non-intact skin of workers.

Allied Universal (AU) has developed the Exposure Control Plan to comply with this federal law. All affected employees who are reasonably anticipated to have occupational exposure to bloodborne pathogens will be trained according to this plan and the regulations set forth in 29 CFR Part 1910.1030.

This Exposure Control Plan shall be reviewed and updated as necessary to reflect new or modified tasks and procedures which affect occupational exposure and to reflect new or revised employee positions with occupational exposure. The review and update shall also reflect changes in technology that eliminate or reduce exposure to bloodborne pathogens to our employees.

Allied Universal solicits input from employees who are potentially exposed to hazards in the workplace through the Job Safety Analysis process. Employees are encouraged to take part in this process and provide feedback to their supervisor on the effectiveness of control measures.

Additionally, this document is reviewed annually by the Health and Safety Director. This review process includes the solicitation of input from Universal Services of America from Carrier Safety Consultant and Legal Team.

**Note:** Any revisions made to this general control plan at a specific site, must be notated below. The most recent additions and modifications to this document include:



# Bloodborne Pathogens Exposure Control Plan

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### SECTION B

## EXPOSURE CONTROL PLAN

### I. COMMUNICATION OF HAZARDS

Allied Universal will use several methods to inform affected employees of potential hazards in their workplace, including:

1. Job Safety Analysis:  
A post-specific Job Safety Analysis (JSA) will be created and maintained to address the hazards identified for work tasks by post assignment. The JSA will be communicated and made available to Security Professionals. See Tab 5 of the corporate Safety Manual for details.
2. Bloodborne Pathogens Training:  
Employees with occupational exposure to blood or OPIM will receive thorough training to communicate the hazards and safety measures Allied Universal will employ to protect employees from bloodborne pathogens. See Section F of this Exposure Control Plan for specific details.
3. Signs and Labels:  
Biohazard warning labels and signs will be used in medical facilities and on equipment, such as waste containers, where contaminated materials and other potential sources of blood or OPIM are reasonably anticipated.

### II. EXPOSURE DETERMINATION

Those most familiar with the work environment, job tasks, equipment and procedures are best suited to determine where potential exposures to bloodborne pathogens may exist.

Allied Universal managers are responsible to evaluate the duties, tasks and procedures performed by all security professionals. This evaluation will be accomplished and documented through use of Appendix 5.2: Hazard Assessment Form, in the corporate Safety Manual, to identify potential sources of exposure to bloodborne pathogens. Where occupational exposure is identified the manager will include these job tasks, hazards and safety precautions on the post-specific Job Safety Analysis (Appendix 5.1), which is made available to all employees.

# Bloodborne Pathogens Exposure Control Plan

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This evaluation will be reviewed and updated as necessary through compliance with the requirements of Tab 5: Job Safety Analysis section of the corporate Safety Manual.

In the event of a non-routine task, managers are responsible to complete Appendix 5.2 and update Appendix 5.1 before employees may be assigned to complete the task.

### III. COMPLIANCE METHODS

- A. **Universal Precautions** shall be observed by all security professionals. All blood or other potential infectious material (OPIM) will be considered to be infectious regardless of the perceived status of the source individual.
- B. The following **Engineering or Work Practice Controls** have been established to eliminate or minimize exposure. These are extremely important in preventing the spread of infection.
  - 1. Hand washing facilities and/or antiseptic soap dispensers are provided for immediate use after contamination.
  - 2. All affected employees will wash their hands as soon as possible after any exposure, after removal of any personal protective equipment and before leaving the medical facility area.
  - 3. Disposable medical hygiene gloves (nitrile, latex, etc.) will be worn when handling or working around all potentially contaminated areas.
  - 4. Puncture-resistant disposal containers for contaminated sharp instruments must be utilized in all medical areas.
  - 5. Notify your supervisor if you locate any broken glassware that may be contaminated. Do not pick up directly with your hands; medical personnel only should clean it up with a brush and dustpan, tongs, cotton swabs or forceps.
  - 6. Contaminated clothing or personal protective equipment shall not be worn outside the medical work area. The clothing shall be placed and transported in bags or containers to be decontaminated before laundered.

# Bloodborne Pathogens Exposure Control Plan

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7. Food and drink must not be stored, prepared or consumed in any refrigerator, freezer, cabinet, counter top or other area where blood or OPIM is stored or may come in contact with.
8. Eating, drinking, smoking, applying cosmetics or lip balm and the handling of cosmetics or contact lenses will be strictly prohibited in work areas where there is the potential for occupational exposure.
9. Do not touch materials labeled with biohazard signs posted in infectious areas or on storage containers, unless specifically trained and equipped to do so.

These engineering or work practice controls will be updated as new information becomes available (such as a change in procedures) and must be reviewed at least annually. Medical personnel, not AU employees, are responsible for inspection and maintenance of all medical tools and equipment.

#### **IV. HAND WASHING FACILITIES**

After removal of personal protective gloves, employees must wash hands and any other potentially contaminated skin area with soap and water immediately, or as soon as feasible. If an employee incurs skin or mucous membrane exposure, these areas shall be washed or flushed with water as appropriate as soon as possible following contact.

Each employee will learn the exact location of all hand washing facilities in his or her working area on the first day of employment. If hand washing facilities are not available, we are required to provide either an antiseptic cleanser in conjunction with clean cloth/paper towels or antiseptic toiles to be followed as soon as possible by the washing with soap and running water.

#### **V. CONTAMINATED SHARPS**

Allied Universal security professionals will not handle contaminated sharps. If an employee finds a sharp the facility medical or janitorial staff should be notified.

#### **VI. NEEDLES**

Allied Universal employees do not use needles for any job duties.

#### **VII. SPLASHING CONTROLS**

# Bloodborne Pathogens Exposure Control Plan

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Food and beverages are **not** to be kept in shelves, cabinets or on counter tops or bench tops where blood or OPIM may be present due to splashing.

Medical personnel are responsible for reducing the possibility of splashing of blood or OPIM.

### VIII. SPECIMENS

If possible, specimens of blood or OPIM should not be handled by AU employees. However, if special circumstances require it, AU requires that all potentially infectious material must be placed in leak proof bags for handling, storage and transport to the pre-determine collection area at the job site. Allied Universal employees shall **never** dispose of any red bag or bag containing blood or OPIMs.

### IX. CONTAMINATED EQUIPMENT

Allied Universal employees do not decontaminate medical equipment.

### X. PERSONAL PROTECTIVE EQUIPMENT (PPE)

Reference Tab 13: Personal Protective Equipment of the corporate Safety Manual for complete program details.

- A. Personal protective equipment requirements will be determined by the manager through Appendix 5.2: Hazard Assessment Form, based on the anticipated exposure to blood or OPIM. Allied Universal managers shall ensure that all PPE requirements are documented on Appendix 5.1: Job Safety Analysis for each post and communicated to affected employees.
- B. All affected employees will complete training to know the proper use, limitations and care of their PPE. Allied Universal managers will hold affected employees accountable to utilize required PPE.
- C. Personal protective equipment provided to affected employees must effectively protect against exposure to blood or OPIM under normal conditions and duration of use for its specific designed protection.
- D. Allied Universal managers shall ensure that the appropriate PPE in the proper sizes is readily accessible to affected employees. Affected employees must inform their supervisor/manager if the PPE is ineffective, does not fit properly or if there are other problems with the PPE.

# Bloodborne Pathogens Exposure Control Plan

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- E. All PPE, including replacement equipment, will be provided without cost to affected employees. Managers will inform affected employees of how to access replacement PPE as needed.
- F. If a non-routine task is assigned, the Manager/Supervisor must be certain the employee is both supplied with the appropriate PPE and trained for its proper use.

### **XI. REPLACEMENT AND DISPOSAL OF CONTAMINATED PPE**

- A. All PPE will be cleaned, laundered and disposed of by AU at no cost to the employees.
- B. Allied Universal will repair or replace PPE as needed to maintain its effectiveness if it becomes damaged (torn, broken, leaks, etc.).
- C. All garments that are penetrated by blood or OPIM shall be removed immediately or as soon as possible.
- D. All PPE will be removed prior to leaving the work area and shall be placed in an appropriately designated area or container for storage, washing, decontamination or disposal.
- E. Contaminated disposable gloves, masks and aprons should be thrown out in red bag garbage receptacles whenever possible. If disposable gloves, masks and aprons were not contaminated you may dispose of in regular waste containers.
- F. Safety glasses should be returned to the assigned storage area after use. If glasses become contaminated they should be cleaned carefully with an appropriate disinfectant.

### **XII. GLOVES**

Gloves must be worn where it is reasonably anticipated that employees could have hand contact with blood, OPIM, non-intact skin and mucous membranes and when handling or touching contaminated items or surfaces.

# Bloodborne Pathogens Exposure Control Plan

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Used disposable gloves are not to be washed or decontaminated for reuse. Gloves are to be replaced as soon as they become contaminated, torn, punctured, or when their ability to function as a barrier is compromised.

Utility gloves may be decontaminated for re-use provided that the integrity of glove is not compromised. Utility gloves must be discarded if they are cracked, peeled, torn, punctured, or exhibit other signs of deterioration or when their ability to function as a barrier is compromised.

### XIII. MASKS/PROTECTIVE EQUIPMENT AND CLOTHING

Masks in combination with eye protection devices, such as goggles or glasses with solid side shield are required to be worn whenever splashes, spray, splatter or droplets or blood or OPIM may be generated and eye, nose, or mouth contamination can be reasonably anticipated.

Protective clothing such as lab coats, gowns, aprons, or similar outer garments appropriate for a task must be used.

### XIV. CONTAMINATED SURFACES

Although all contaminated work surfaces should have been decontaminated after completion of a medical procedure or accident, it is your responsibility as an Allied Universal employee to disinfect all designated work surfaces on a daily basis to ensure they are safely kept clean. If you come across an obvious oversight such as broken glass, a stray needle or sharp, used bandage, blood or OPIM - DO NOT TOUCH, carefully clean around the item and notify your Manager/Supervisor. A note will be left so the proper medical personnel can remove the hazard.

Any equipment protective coverings, such as plastic wrap or aluminum foil will be disposed of by medical personnel, making it unnecessary to handle. All contaminated bins, pails, cans, receptacles, reusable sharps and other tools will be kept clean by medical personnel. Do not touch these items, but if you notice a possible source of contamination on protective coverings or any equipment that has not been decontaminated, please notify your supervisor.

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### XV. LAUNDRY PROCEDURES

In the event laundry becomes contaminated with blood or OPIM it should be handled as little as possible. Such laundry should be placed in appropriately marked bags in the laundry section. All employees who handle contaminated laundry should utilize gloves and other PPE to prevent contact with blood or OPIM.

### XVI. REGULATED WASTE DISPOSAL

All contaminated waste (sharps and non-sharps) is discarded in proper containers by medical personnel only. **Do not touch** any sharps containers, red bag biohazard waste receptacles, and unsealed or unlabeled secondary container boxes.

## SECTION C

### HEPATITIS B VACCINE

All affected employees will be offered the Hepatitis B Vaccine at no cost to the employee.

An employee who chooses not to accept the vaccine must sign the attached statement of declination of Hepatitis B Vaccination. The statement can only be signed by the employee following appropriate training regarding HBV, Hepatitis B Vaccination, the efficacy, safety, method of administration, and benefits of vaccination and that the vaccine and vaccination are provided free of charge to the employee. This statement is not a waiver; employees can request and receive the Hepatitis B Vaccination at a later date if they remain occupationally at risk for Hepatitis B.

All affected employees will be provided Appendix 12.1 and complete Appendix 12.2 of this plan; Appendix 12.2 will be maintained in their personnel file.

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### SECTION D

#### **EXPOSURE REPORTING, EVALUATION & FOLLOW-UP**

An exposure incident is when an employee comes in direct contact with blood or OPIM on an exposed eye, mouth, other mucus membrane, non-intact skin surface or their skin is cut/punctured by a contaminated sharp.

Immediately following an exposure incident:

1. Cleanse the contact area immediately with soap and water.
2. If possible an attempt to collect the source (needle, scalpel, bandage, etc.) the employee was exposed with and bring it to the medical facility he or she visits. Use extreme care when isolating this item to prevent further spread of the blood or OPIM.
3. Notify the Manager/Supervisor.

**The Manager/Supervisor must report the incident within promptly to their local Branch Office and the Third Party Administrator.**

The Manager/Supervisor will complete Appendix 12.4: Exposure Incident Report and submit it to [safety@aus.com](mailto:safety@aus.com) within 24 hours of being notified of the exposure incident.

All employees who incur an exposure incident will be offered post-exposure evaluation and follow-up in accordance with the OSHA standard. This follow-up will include the following:

1. Documentation of the route of exposure and the circumstances related to the incident.
2. If possible, the identification of the source individual and if possible, the status of the source individual. The blood of the source individual will be collected as soon as possible and will be tested (if consent is obtained) for HIV/HBV infection.



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3. Results of the source individual testing will be made available to the exposed employee who will also be informed about the applicable laws and regulations concerning disclosure of the identity and infectivity of the source individual.
4. If the exposed employee consents to having his or her blood collected but does not consent to HIV/HBV serological status testing, the blood sample will be preserved for at least 90 days to allow the employee to decide if the blood should be tested for HIV serological status. However, if the employee decides prior to that time that testing should be conducted, then the appropriate action should be taken.
5. The employee will be consulted as to the prevention of or protective treatment for disease in accordance with current recommendations of the U.S. Public Health Service.
6. Appropriate counseling concerning precautions to take during the post-incident period shall be made available to the employee along with information on symptoms for and the need to report any related experiences to appropriate personnel.
7. All records generated from the post-exposure evaluation, follow-up care, written opinion of the medical provider and Appendix 12.4 will be retained as detailed in Tab 17: Access to Medical and Exposure Records of the corporate Safety Manual.
8. The Branch Manager/General Manager/Division Manager has been designated as responsible for ensuring that the policy outlined here is effectively carried out and to maintain records related to this policy.

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### SECTION E

#### **INTERACTION WITH HEALTHCARE PROFESSIONALS**

A written opinion should be obtained from the health care professional who performs the post-exposure evaluation and follow-up care.

1. Written opinion will be obtained in the following instances:
  - A. When our employees are sent to receive the Hepatitis B Vaccine.
  - B. When our employee is sent to a health care professional following an exposure incident.
  
2. Health care professionals will be instructed to limit their opinions to:
  - A. Whether the Hepatitis B Vaccine is indicated and if the employee has received the vaccine, or for evaluation following an incident.
  - B. That the employee has been informed of the results of the evaluation.
  - C. That the employee has been told about any medical conditions resulting from exposure to blood or OPIM.

**NOTE THAT THE WRITTEN OPINION TO OUR COMPANY IS NOT TO REFERENCE ANY PERSONAL MEDICAL INFORMATION OR TEST RESULTS.**

# Bloodborne Pathogens Exposure Control Plan

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### SECTION F

#### **EMPLOYEE BLOODBORNE PATHOGEN TRAINING**

All affected employees need to receive training coordinated by the Branch Manager/General Manager/Division Manager. Training can significantly contribute to the overall reduction of risk to workers potentially exposed to infectious materials.

A copy of the regulatory text from OSHA for bloodborne pathogens will be made available to employee during training. The Bloodborne Pathogens Training Booklet contains all necessary contents as required by the OSHA standard for bloodborne pathogens including:

1. An explanation of the OSHA's standard for Bloodborne Pathogens.
2. Information (Epidemiology and Symptomatology) of Bloodborne Diseases.
3. Modes of transmission of Bloodborne Pathogens.
4. Explanation of this Exposure Control Plan.
5. Recognizing possible exposure tasks and procedures.
6. Methods of preventing or reducing exposure.
7. Information on personal protective equipment.
8. Information on Hepatitis B Vaccine.
9. Procedures in the event of an exposure incident.
10. Signs, labels and/or color-coding used at the facility.
11. Interactive question and answer session.

Training documentation will be retained for no less than 5 years and shall include:

- Include list of all employees receiving this training, date of training, signature and date, month of annual refresher course, and instructor (See Appendix E Section 11).
- Include list of all employees who participated in the video presentation, date of presentation, signature and date, which videos viewed, and instructor (See Appendix E Section 12).

Allied Universal shall ensure affected employees participate in a training program which must be provided at no cost to the employee and during working hours.

Training shall be provided to affected employees at the time of initial assignment to tasks where occupational exposure may take place. Refresher training will then take place at least annually thereafter as all employees shall be provided training within one year of their previous training date.

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Employees shall be provided additional training when changes such as modification of tasks or procedures or institution of new tasks or procedures affect the employee's occupational exposure. The additional training may be limited to addressing the changes in exposure.

The training program shall contain at a minimum the following elements:

1. An accessible copy of the regulatory text of this standard and an explanation of its contents;
2. A general explanation of the epidemiology and symptoms of bloodborne diseases;
3. An explanation of the modes of transmission of bloodborne pathogens;
4. An explanation of the employer's exposure control plan and the means by which the employee can obtain a copy of the written plan;
5. An explanation of the appropriate methods for recognizing tasks and other activities that may involve exposure to blood and other potentially infectious materials;
6. An explanation of the use and limitations of methods that will prevent or reduce exposure including appropriate engineering controls, work practices, and personal protective equipment;
7. Information on the types, proper use, location, removal, handling, decontamination and disposal of personal protective equipment;
8. An explanation of the basis for selection of personal protective equipment;
9. Information on the hepatitis B vaccine, including information on its efficacy, safety, method of administration, the benefits of being vaccinated, and that the vaccine and vaccination will be offered free of charge;
10. Information on the appropriate actions to take and persons to contact in an emergency involving blood or other potentially infectious materials;
11. An explanation of the procedure to follow if an exposure incident occurs, including the method of reporting the incident and the medical follow-up that will be made available;
12. Information on the post-exposure evaluation and follow-up that the employer is required to provide for the employee following an exposure incident;
13. An explanation of the signs and labels and/or color coding required by paragraph (g)(1); and
14. An opportunity for participants to ask questions and receive answers from the person conducting the training session. Regulations require an opportunity for interactive participation.

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## Tab 12

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### SECTION G

#### **RECORDKEEPING**

##### **Requirements**

In accordance with 29 CFR 1910.20, all medical records relating to the bloodborne pathogen standard (vaccination status, exposure incidents, follow-up exams, the employer's copy of the healthcare professional's written opinion, a copy of the information provided to the healthcare professional etc.) are to be maintained strictly confidential for the duration of employment plus an additional 30 years. These records must be kept confidential and should not be kept in the employee's personnel file. These files are not disclosed or reported without the employee's express written consent to any person within or outside the workplace except as required by law.

All training records relating to this standard shall be maintained for **three years** and documented to include the name and employee number of trainees, the content of education and training, and instructor's name..

##### **Availability**

Allied Universal shall ensure that all records required to be maintained shall be made available upon request to the Assistant Secretary and the Director for examination and copying.

Employee training records required by this standard shall be provided upon request for examination and copying to employees, to employee representatives, and OSHA.

Employee medical records required by this standard shall be provided upon request for examination and copying to the subject employee, to anyone having written consent of the subject employee, to the Director, and to the Assistant Secretary in accordance with 29 CFR 1910.1020.

##### **Transfer of Records.**

If Allied Universal ceases to do business and there is no successor employer to receive and retain the records for the prescribed period, Allied Universal shall notify the Director, at least three months prior to their disposal and transmit them to the Director, if required by the Director to do so, within that three month period.

# Bloodborne Pathogens Exposure Control Plan

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### SECTION H

#### **GLOSSARY OF TERMS**

<b><i>Affected Employees</i></b>	means any employee who is reasonably anticipated to have potential exposure to bloodborne pathogens through their work tasks
<b><i>Blood</i></b>	means human blood, human blood components, and products made from human blood.
<b><i>Bloodborne Pathogens</i></b>	means pathogenic microorganisms that use present in human blood and can cause disease in humans. These pathogens include, but are not limited to, hepatitis B virus (HBV) and human immunodeficiency virus (HIV).
<b><i>Contaminated</i></b>	means the presence or the reasonably anticipated presence of blood or other potentially infectious materials on an item or surface.
<b><i>Contaminated Laundry</i></b>	means laundry that has been soiled with blood or other potentially infectious materials or may contain sharps.
<b><i>Contaminated Sharps</i></b>	means any contaminated object that can penetrate the skin including, but not limited to, needles, scalpels, broken glass, broken capillary tubes, and exposed ends of dental wires.
<b><i>Decontamination</i></b>	means the use of physical or chemical means to remove, inactivate, or destroy bloodborne pathogens on a surface or item to the point where they are no longer capable of transmitting infectious particles and the surface or item is rendered safe for handling, use, or disposal.
<b><i>Engineering Controls</i></b>	means controls (e.g., sharps disposal containers, hand-washing facilities) that isolate or remove the bloodborne pathogens hazard from the workplace.
<b><i>Exposure Incident</i></b>	means a specific eye, mouth, other mucous membrane, non-intact skin, or parenteral contact with blood or other potentially infectious materials that result from the performance of an employee's duties.

# Bloodborne Pathogens Exposure Control Plan

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### ***Hand Washing Facilities***

means a facility providing an adequate supply of running potable water, soap and single use towels of hot air drying machines.

### ***Licensed Healthcare Professional***

is a person whose legally permitted scope of practice allows him or her to independently perform the activities required by **Sections C, D, & E** for Hepatitis B Vaccination and Post-exposure Evaluation and Follow-up.

### ***HBV***

means hepatitis B virus.

### ***HIV***

means human immunodeficiency virus.

### ***Occupational Exposure***

means reasonably anticipated skin, eye, mucous membrane, or parenteral contact with blood or other potentially infectious materials that may result from the performance of an employee's duties.

### ***Other Potentially Infectious Materials***

means (1) The following human body fluids: semen, vaginal secretions, cerebrospinal fluid, synovial fluid, pleural fluid, pericardial fluid, peritoneal fluid, amniotic fluid, saliva in dental procedures, any body fluid that is visibly contaminated with blood, and all body fluids in situations where it is difficult or impossible to differentiate between body fluids; (2) Any unfixed tissue or organ (other than intact skin) from a human (living or dead); and (3) HIV-containing cell or tissue cultures, organ cultures, and HIV- or HBV-containing culture medium or other solutions; and blood, organs, or other tissues from experimental animals infected with HIV or HBV.

### ***Parenteral***

means piercing mucous membranes or the skin barrier through such events as needle sticks, human bites, cuts and abrasions.

### ***Personal Protective Equipment (PPE)***

is specialized clothing or equipment worn by an employee for protection against a hazard. General work clothes (e.g., uniforms, pants, shirts, or blouses) not intended to function as protection against a hazard is not considered PPE.

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### ***Sharps***

means any object that can penetrate the skin, including but not limited to needles, scalpels, broken glass, medical tools, etc.

### ***Source Individual***

means any individual, living or dead, whose blood or other potentially infectious materials may be a source of occupational exposure to the employee.

### ***Sterilize***

means the use of a physical or chemical procedure to destroy all microbial life including highly resistant bacterial endospores.

### ***Universal Precautions***

is an approach to infection control. According to the concept of Universal Precautions, all human blood and certain human body fluids are treated as if known to be infectious for HIV, HBV, and other bloodborne pathogens.

### ***Work Practice Controls***

means controls that reduce the likelihood of exposure by altering the manner in which a task is performed (e.g., prohibiting eating, drinking, smoking, applying cosmetics or lip balm and the handling of cosmetics or contact lenses where there is the potential for occupational exposure).



# Bloodborne Pathogens Exposure Control Plan

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### APPENDIX 12.1

## INFORMATION ON HEPATITIS B (HBV)

### THE DISEASE

Hepatitis B is a viral infection caused by hepatitis B virus (HBV). Most people with hepatitis B recover completely, but approximately 5 - 10% become chronic carriers of the virus. Most of these people have no symptoms, but can continue to transmit the disease to others. Symptoms of HBV infection range from no symptoms to flu like symptoms. HBV can cause death in 1-2% of patients.

HBV may be present in body fluids such as blood, semen, saliva and other body fluids contaminated with blood. Bloodborne diseases can be transmitted directly through cuts, skin abrasions, dermatitis and mucous membranes (mouth, nose and eyes).

### PREVENTION

**Universal Precautions.** You are required to treat all human blood and certain body fluids as if they were infected with HIV, HBV and other bloodborne diseases.

Hand washing with soap is important to the prevention of the spread of infection. After the use of gloves, hands must still be washed. You should be careful when removing gloves making sure you do not touch the outside of the glove.

Personal protective equipment such as gowns and glasses is available for use when anticipating an exposure to body fluids. Red bags are used for the disposal of bandages, spill kits and other infectious materials.

### THE VACCINE

The vaccine for hepatitis B is made from yeast using recombinant methods. People with immune system abnormalities, such as dialysis patients, have less response to the vaccine, but over half of those receiving it do develop antibodies. Full immunization requires 3 doses of vaccine over a six-month period although some persons may not develop immunity even after 3 doses. There is no evidence that the vaccine has ever caused hepatitis B, however, persons who have been infected with the HBV prior to receiving the vaccine may go on to develop clinical hepatitis in spite of immunization. The duration of immunity is unknown at this time; however, it is likely that a booster will be needed after five - ten years.

### POTENTIAL SIDE EFFECTS

Potential side effects include fatigue, fever, nausea, vomiting, headache, and injection site reactions. The possibility exists (as with other vaccines) that broad use could reveal adverse reactions not observed in clinical trials. The vaccine is contraindicated if you are hypersensitive to yeast.

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### APPENDIX 12.2

## HEPATITIS B VACCINATION FORM

Print your and Employee Number, then sign and date **one** of the three options below (A/B/C).

---

(Print Name of Employee)

(Employee Number)

### A. **Consent for Hepatitis B Vaccine**

I, named above, have been informed that I am at risk of acquiring Hepatitis B because of the nature of my professional responsibilities and the exposure to blood and other potentially infectious materials. **I agree to be immunized against Hepatitis B** and that Allied Universal has given me information on where I can receive the vaccinations at no cost to myself. I must receive three doses of vaccine over a six month period to receive optimal immunity. Although some information was provided, I understand that it is my responsibility to discuss with a healthcare expert the known benefits and side effects of the Hepatitis B vaccine before being vaccinated. There may be dangers in being vaccinated such as while breast feeding or becoming pregnant during the six month vaccination period.

I understand that upon receiving the series of Hepatitis B vaccines that there is still no guarantee that I will not experience an adverse reaction to the vaccine or that I will become immune. In the event that I experience adverse side effects or do not become immune to Hepatitis B, I hereby hold Allied Universal harmless from any and all liability to the extent permitted by law.

However, I may decide after further consideration not to receive any Hepatitis B vaccine or after receiving one or more from the series of the vaccinations, to decline the remaining. I understand that if by changing my decision and by declining to receive the entire series of vaccinations at this time, I continue to be at risk of acquiring Hepatitis B, a serious disease. If in the future I continue to have occupational exposure to blood or other potentially infectious materials and I want to be vaccinated with Hepatitis B vaccine, (while still in the employ of Allied Universal) I can then receive the vaccination series at no charge to me. I will first contact Allied Universal to receive updated paperwork for where to receive the Hepatitis B vaccine. I have had my questions regarding the Hepatitis B vaccination answered to my satisfaction.

---

(Signature of Employee)

(Date)

### B. **Previous Immunization with Hepatitis B Vaccine**

I, named above, have previously completed the entire three-dose series of the Hepatitis B vaccine in or around the year \_\_\_\_\_. Because I am certain that I have already been immunized, **I am not in need of this offer**. I have had my questions regarding the Hepatitis B vaccination answered to my satisfaction.

---

(Signature of Employee)

(Date)

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### ***C. Refusal to Receive the Hepatitis B Vaccine***

I, named above, understand that due to my occupational exposure to blood and other potentially infectious materials I may be at risk of acquiring the Hepatitis B virus (HBV) infection. I have been given the opportunity to be vaccinated with Hepatitis B vaccine, at no charge to myself. However, **I decline Hepatitis B vaccination** at this time.

I understand that by declining this vaccine, I continue to be at risk of acquiring Hepatitis B, a serious disease. If in the future I continue to have occupational exposure to blood or other potentially infectious materials and I want to be vaccinated with Hepatitis B vaccine (while still in the employ of Allied Universal), I can receive the vaccination at no charge to me. I have had my questions regarding the Hepatitis B vaccination answered to my satisfaction.

---

(Signature of Employee)

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(Date)

*THIS FORM MUST BE MAINTAINED FOR THE  
DURATION OF EMPLOYMENT PLUS 30 YEARS*

# Bloodborne Pathogens Exposure Control Plan

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### Appendix 12.3

#### Standard Precautions to Prevent Bloodborne Pathogens Exposure

Employees who are reasonably expected to be exposed to bloodborne pathogens in their work will use the following standard precautions, as part of the Allied Universal Bloodborne Pathogens Exposure Control Plan, including:

1. Employees will operate with caution assuming that any and all persons or bodily fluids may be infectious for HIV, HBV or other bloodborne pathogens.
2. Eating, drinking, smoking, applying cosmetics or lip balm, and handling contact lenses are prohibited in work areas where there is a reasonable likelihood of occupational exposure.
3. Employees will follow the site hand washing protocols. At a minimum employees will wash their hands with tepid water and antibacterial non-abrasive soap at the following times:
  - When visibly dirty or contaminated
  - Before eating
  - After using the restroom
  - After removing gloves
  - After direct patient contact with skin or body fluids

NOTE: In healthcare environments where contact with high-risk patients is possible, fingernail length must be trimmed to ¼-inch or shorter, and no artificial nails are permitted.

4. Disposable gloves will be worn when searching bags or handling any person(s), clothing or equipment that may have body fluids on them. Disposable gloves will be medical quality, made of latex, PVC, nitrile or other appropriate material.
5. Personal Protective Equipment (PPE) will be worn as required by the potential hazards, in accordance with training and local policy. Levels of PPE are defined by OSHA 1910.120 (Appendix 13.1) and divided into four categories based on the degree of protection afforded.
  - **Level A (highest level)** - To be selected when the greatest level of skin, respiratory, and eye protection is required. Level A includes:
    1. Positive pressure, full face-piece self-contained breathing apparatus (SCBA), or positive pressure supplied air respirator with escape SCBA, approved by the National Institute for Occupational Safety and Health (NIOSH).
    2. Totally-encapsulating chemical-protective suit.
    3. Coveralls.(1)
    4. Long underwear.(1)
    5. Gloves, outer, chemical-resistant.
    6. Gloves, inner, chemical-resistant.
    7. Boots, chemical-resistant, steel toe and shank.
    8. Hard hat (under suit).(1)
    9. Disposable protective suit, gloves and boots (depending on suit construction, may be worn over totally-encapsulating suit).

# Bloodborne Pathogens Exposure Control Plan

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- **Level B** - The highest level of respiratory protection is necessary but a lesser level of skin protection is needed. The following constitute Level B equipment; it may be used as appropriate.
  1. Positive pressure, full-face piece self-contained breathing apparatus (SCBA), or positive pressure supplied air respirator with escape SCBA (NIOSH approved).
  2. Hooded chemical-resistant clothing (overalls and long-sleeved jacket; coveralls; one or two-piece chemical-splash suit; disposable chemical-resistant overalls).
  3. Coveralls.(1)
  4. Gloves, outer, chemical-resistant.
  5. Gloves, inner, chemical-resistant.
  6. Boots, outer, chemical-resistant steel toe and shank.
  7. Boot-covers, outer, chemical-resistant (disposable).(1)
  8. Hard hat.(1)
  9. Face shield.(1)
  
- **Level C** - The concentration(s) and type(s) of airborne substance(s) is known and the criteria for using air purifying respirators are met. The following constitute Level C equipment; it may be used as appropriate.
  1. Full-face or half-mask, air purifying respirators (NIOSH approved).
  2. Hooded chemical-resistant clothing (overalls; two-piece chemical-splash suit; disposable chemical-resistant overalls).
  3. Coveralls.(1)
  4. Gloves, outer, chemical-resistant.
  5. Gloves, inner, chemical-resistant.
  6. Boots (outer), chemical-resistant steel toe and shank.(1)
  7. Boot-covers, outer, chemical-resistant (disposable).(1)
  8. Hard hat.(1)
  9. Escape mask.(1)
  10. Face shield.(1)
  
- **Level D** - A work uniform affording minimal protection: used for nuisance contamination only. The following constitute Level D equipment; it may be used as appropriate:
  1. Coveralls.
  2. Gloves.(1)
  3. Boots/shoes, chemical-resistant steel toe and shank.
  4. Boots, outer, chemical-resistant (disposable).(1)
  5. Safety glasses or chemical splash goggles.(1)
  6. Hard hat.(1)
  7. Escape mask.(1)
  8. Face shield.(1)

# Bloodborne Pathogens Exposure Control Plan

## Tab 12

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### APPENDIX 12.4

### EXPOSURE INCIDENT REPORT

Employee Name: \_\_\_\_\_

Employee Number: \_\_\_\_\_

Branch Address Location: \_\_\_\_\_

Branch Phone Number: \_\_\_\_\_

Date of Incident: \_\_\_\_\_

Witness Names: \_\_\_\_\_

Exact Location (address) of Incident: \_\_\_\_\_

Description of Incident (How did it occur, what part of the body was affected, what was the individual doing at the time of the incident, etc.):

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Was the sample of the infectious source saved?    \_\_\_\_\_ Yes    \_\_\_\_\_ No

If yes, where is the sample? \_\_\_\_\_

Source Patient's name if known: \_\_\_\_\_

HBV/HIV Source Antibody status if known: \_\_\_\_\_

Measures which will be implemented to prevent reoccurrence of this exposure incident:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

# Personal Protective Equipment (PPE)

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### PURPOSE

The purpose of this policy is to protect Allied Universal (AU) employees from exposure to work place hazards and the risk of injury through the proper selection, use, and maintenance of personal protective equipment (PPE). PPE is not a substitute for more effective control methods and its use will be considered only when other means of protection against hazards are not adequate or feasible. PPE will be used in conjunction with other controls unless no other means of hazard control exist.

Personal protective equipment will be provided, used, and maintained when it has been determined that its use is necessary to protect the safety and health of our employees and that such use will lessen the likelihood of occupational injury and/or illness.

### SCOPE

This section of the Safety Manual provides guidance on how to manage the use of PPE to protect the health and safety of AU employees. This document includes:

1. Responsibilities of management, supervisors and employees
2. Hazard assessment and PPE selection
3. Employee training
4. Cleaning and Maintenance of PPE
5. PPE Storage, Inspection and Replacement

### APPLICATION

This program applies to all AU employees. The requirements of this program are based on OSHA standards found in 29 CFR 1910.132, and 8 CCR 3380.

### RESPONSIBILITIES

#### Corporate Risk Management will:

- Provide guidance and assistance to managers/supervisors on the proper selection, use, and care of approved PPE.
- Review, evaluate, and update the overall effectiveness of PPE use, training, and policy.

#### Managers/ Supervisors will:

- Have the primary responsibility for implementing and enforcing PPE use and policies in their work area.
- Conduct workplace hazard assessments to determine if hazards exist which necessitate the use of PPE.
- Provide appropriate PPE, and replacement PPE upon request, at no cost to employees.
- Provide affected employees, prior to use of equipment, with training on the proper use, care, and cleaning of PPE.
- Hold employees accountable to properly use and maintain their PPE.
- Dispose of defective/damaged PPE and replace equipment as needed.

# Personal Protective Equipment (PPE)

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- Review and update the Job Safety Analysis and PPE requirements whenever:
  - A job changes
  - New equipment is used
  - An incident investigation reveals failure of PPE to adequately protect an employee or employee failure to properly use or maintain PPE
  - Upon request
  - At least annually
- Maintain the following records:
  - PPE Hazard Assessment forms
  - PPE Training documentation

### Employees' Responsibilities:

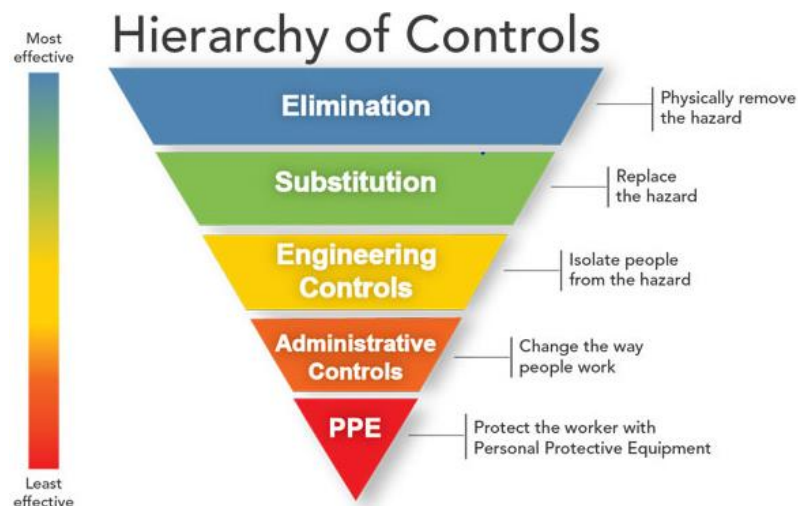
The PPE user is responsible for following the requirements of the PPE policies, who will:

- Participate in completing the PPE Hazard Assessment as needed.
- Properly wear PPE as required.
- Attend required training sessions.
- Properly care for, clean, maintain, inspect and use PPE as required.
- Follow the PPE policies and rules outlined in this document.
- Inform their supervisor of the need to repair or replace PPE.

Employees who repeatedly disregard and do not follow PPE policies and rules will be subjected to discipline, up to and including potential termination.

### PERSONAL PROTECTIVE EQUIPMENT ASSESSMENTS

Personal protective equipment is a shield used to guard against the impacts of hazards in the workplace which cannot be eliminated or adequately minimized through other safety measures. Management should make all reasonable efforts to apply more effective controls, such as elimination, substitution, engineering controls and/or administrative controls before relying on PPE to protect against hazards.





# Personal Protective Equipment (PPE)

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OSHA requires that all employers comply with 29 CFR 1910.132, the Personal Protective Equipment Standard. The standard requires employers to assess the workplace to determine if hazards are present, or are likely to be present, which necessitate the use of personal protective equipment (PPE). If such hazards are present, or are likely to be present, the employer must select appropriate PPE and require employees to use it. This process will be completed and documented by use of the Hazard Assessment Form (Appendix 5.2).

A PPE assessment must be completed for each job in your workplace. This should be done in conjunction with the Job Safety Analysis (JSA) process. Jobs will need to be broken down into tasks to be sure all of the hazards associated with them have been identified. Once the hazards of a workplace have been identified, the Manager/Supervisor will determine if the hazards can first be eliminated or reduced by methods other than PPE; methods that do not rely on employee behavior or training, such as engineering controls, are preferred.

### **SELECTION OF PPE**

When primary hazard control methods are not adequate or feasible, then the Manager/Supervisor will select PPE that will adequately protect employees from the hazards. Care will be taken to recognize the possibility of multiple and simultaneous exposure to a variety of hazards. Adequate protection against the highest level of each of the hazards is recommended.

All personal protective clothing and equipment will be of safe design and construction for the work task/ environment and will be maintained in a sanitary and reliable condition. Newly purchased PPE must conform to the updated ANSI standards which have been incorporated into the PPE regulations, as follows:

- Eye and Face Protection ANSI Z87.1-1989
- Head Protection ANSI Z89.1-1986
- Foot Protection ANSI Z41.1-1999
- Hand Protection (There are no ANSI standards for gloves, however, selection must be based on the performance characteristics of the glove in relation to the tasks to be performed.)
- High Visibility Protection ANSI Z107

Affected employees whose jobs require the use of PPE will be informed of the PPE selection and will be provided PPE at no charge. Consideration will be given to the comfort and proper fit of PPE in order to ensure that the right size is provided.

### **Voluntary Use Guidelines:**

When personal protective equipment is not deemed necessary for a given job task through use of the PPE Hazard Assessment process, employees will not be provided with or required to wear PPE. Employees may request approval through their manager/ supervisor to voluntarily use PPE. Managers must determine that the requested equipment or use will not in itself create a hazard.

If employee-owned equipment is approved by management the manager is responsible for checking that this equipment is adequate, properly maintained and sanitary. Defective or damaged PPE shall NOT be used. Voluntary PPE, which is approved for use by management, will not be provided by, replaced or paid for by Allied Universal.

# Personal Protective Equipment (PPE)

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### HIGH VISIBILITY PPE GARMENTS

Where Allied Universal employees are exposed to vehicle traffic in the course of their job duties, these hazards shall be documented on the post-specific Job Safety Analysis. The protective measures for such exposures, if the hazard cannot be eliminated, will include the use of high visibility PPE. High visibility PPE will be implemented following these minimum requirements:

	Description	Applicable Areas of Use
Class 1	Minimum amount of high-visibility materials to differentiate wearer in non-complex environments.	<ul style="list-style-type: none"> <li>Exposure to limited traffic, less than 15 mph</li> <li>Limited parking lot patrols</li> <li>Work areas where equipment may be moving</li> <li>General visibility uses</li> </ul>
Class 2	Offers better definition of the wearer.	<ul style="list-style-type: none"> <li>Exposure to routine traffic, up to 40mph</li> <li>Parking lot patrols where walking through parking/travel areas</li> <li>Vehicle check-ins</li> <li>Road closure work, airport ground work and train traffic</li> </ul>
Class 3	Provides greater visibility to the wearer in complex backgrounds.	<ul style="list-style-type: none"> <li>Exposure to routine traffic, exceeding 40 mph</li> <li>Truck traffic/ inspection/ exposure</li> <li>Directing traffic</li> </ul>

Flame Resistance: High-visibility garments will be labeled to identify if the garment meets flame resistance standards.

- Where Flame Resistant apparel is required for a specific post, high-visibility garments will be required to meet the same standard. Garments which meet the standard will include the letters FR or a separate label indicated NFPA certification.
- Where Flame Resistant apparel is not a requirement for the post, the high-visibility apparel need not be rated as Flame Resistant. For these jobs high-visibility apparel marked with "This garment is not flame resistant as defined by ANSI/SEA 107" are sufficient and acceptable for use.

High-visibility items have a limited lifetime that varies with use and should be inspected periodically for the condition of reflective and neon elements. Garments should be replaced or repaired when noticeable faded, soiled or damaged. Service life for items worn on a daily basis may be approximately 6 months, while garments worn periodically are expected to have a useful service life of several years.

# Personal Protective Equipment (PPE)

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### RESPIRATORY PROTECTION

#### Where respirators are required:

At any worksite where respirators are necessary for routine, non-routine or emergency operations to protect the health of AU employees, management shall establish and implement a written respiratory protection program with worksite-specific procedures. The program shall be updated as necessary to reflect those changes in workplace conditions that affect respirator use. Affected sites may use the Sample Respiratory Protection Program (Appendix 13.3 of this section) to create and document their site-specific Respiratory Protection Program. The following issues will be addressed, as applicable:

1. Procedures for selecting respirators for use in the workplace;
2. Medical evaluations of employees required to use respirators (use Appendix 13.2 – Mandatory Respirator Medical Evaluation);
3. Fit testing procedures for tight-fitting respirators;
4. Procedures for proper use of respirators in routine and reasonably foreseeable emergency situations;
5. Procedures and schedules for cleaning, disinfecting, storing, inspecting, repairing, discarding, and otherwise maintaining respirators;
6. Procedures to ensure adequate air quality, quantity, and flow of breathing air for atmosphere-supplying respirators (where applicable);
7. Training of employees in the respiratory hazards to which they are potentially exposed during routine and emergency situations;
8. Training of employees in the proper use of respirators, including putting on and removing them, any limitations on their use, and their maintenance; and
9. Procedures for regularly evaluating the effectiveness of the program.

Where respirators are required PPE, AU will provide respirators, training, and medical evaluations at no cost to the employee.

All fit tests shall be administered using an OSHA-accepted Qualitative Fit Test or Quantitative Fit Test protocol. Allied Universal will use only OSHA-accepted protocols and procedures, as described in Appendix A of the OSHA standard 29 CFR 1910.134.

Local management shall designate a program administrator who is qualified by appropriate training or experience that is commensurate with the complexity of the program to administer or oversee the respiratory protection program and conduct the required evaluations of program effectiveness.

#### Where respirator use is not required:

Local management will determine if they will permit AU employees to voluntarily use a respirator when such PPE is deemed not required. When voluntary use of a respirator is permitted the following is required:

1. Management must determine that the respirator use will not in itself create a hazard;
2. Management must provide voluntary respirator users with Appendix D of the OSHA standard 29 CFR 1910.134 ("Information for Employees Using Respirators When Not Required Under the Standard");

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Management must maintain a site-specific written respiratory protection program as described in section A above. NOTE: A written respiratory protection program is NOT required when the only type of voluntary respirator use is limited to a filtering face piece (dust mask) respirator.

### EMPLOYEE TRAINING

All employees required to use PPE to perform their assigned job duties will complete training initially upon assignment and annually thereafter, or when retraining is necessary (see below). Training for each piece/type of PPE will include at a minimum, but not limited to, the following topics:

- When PPE is necessary to be worn
- What PPE is necessary
- How to properly don, doff, adjust, and wear PPE
- The limitations of the PPE
- The proper care, maintenance, useful life, and disposal of the PPE

Following PPE training, employees will complete a knowledge assessment (quiz) to evaluate employees' understanding of the training material. Any employee unable to achieve a minimum score of 80% on this assessment will be retrained. These records will be kept in the employee training records. Retraining will be provided when necessary:

- When changes to the workplace make previous training obsolete
- When new PPE is required
- When there are changes to the type of PPE used
- When an employee is unable to demonstrate understanding of training material
- When an employee demonstrates lack of use, improper use, or insufficient skill or understanding in how to use PPE
- Upon request

All training, completed internally or externally, must be documented in WinTeam using Compliance Code "PPE Training." The specific PPE must be referenced in the Notes section of the compliance record. The training knowledge assessment must include the employee name, the dates of training, and the certification subject.

### CLEANING AND MAINTENANCE OF PPE

It is important that all PPE be kept clean and properly maintained. Cleaning is particularly important for eye and face protection where dirty or fogged lenses could impair vision. Employees must inspect, clean, and maintain their PPE according to the manufacturers' instructions before and after each use (see attached). Managers/Supervisors and users are responsible for proper maintenance of all PPE.

Personal protective equipment must not be shared between employees until it has been properly cleaned and sanitized. PPE will be distributed for individual use when possible. Defective or damaged PPE will not be used and will be immediately discarded and replaced.

NOTE: Defective equipment can be worse than no PPE at all. Employees would avoid a hazardous situation if they knew they were not protected; but they would get closer to the hazard if they erroneously believed they were protected, and therefore would be at greater risk.

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### PPE HAZARD ASSESSMENT - APPENDIX 13.1

This tool is used to complete a hazard assessment to determine if your employees need to use personal protective equipment (PPE) by identifying activities that may create hazards for your employees. The activities are grouped according to what part of the body might need PPE.

This tool also serves as written certification that a hazard assessment has been completed. Ensure that the blank fields at the beginning of the checklist (indicated by \*) are filled out (see below, Instructions #4).

#### Instructions:

1. Do a walk-through survey of each work area and job/task. Review the list of work activities in the first column, putting a check next to the activities performed in that work area or job, either by your employee(s) or by others in near proximity.
2. Review the list of hazards in the second column, putting a check next to the hazards to which employees may be exposed while performing the work activities or while present in the work area. (For example, work activity: chopping wood; work-related exposure: flying particles).
3. Determine how the identified hazards will be controlled. Consider engineering and/or administrative controls to eliminate or reduce the hazards before resorting to use of PPE. If the hazard cannot be eliminated without using PPE, indicate which type(s) of PPE will be required to protect your employee from the hazard.
4. Complete the following fields on the form (indicated by \*) to certify that a hazard assessment was done:
  - Name of your work place
  - Address of the work place where you are doing the hazard assessment
  - Name of person certifying that a workplace hazard assessment was done
  - Date the hazard assessment was done

# Personal Protective Equipment (PPE) - Tab 13

## PPE HAZARD ASSESSMENT CERTIFICATION FORM

\*Name of work place: \_\_\_\_\_ \*Assessment conducted by: \_\_\_\_\_

\*Work place address: \_\_\_\_\_ \*Date of assessment: \_\_\_\_\_

Work area(s): \_\_\_\_\_ Job/Task(s): \_\_\_\_\_

*\*Required for certifying the hazard assessment.*

*Note: Use a separate sheet for each job/task or work area*

EYES		
Personal or nearby work activities, such as: <input type="checkbox"/> abrasive blasting <input type="checkbox"/> sanding <input type="checkbox"/> chopping <input type="checkbox"/> sawing <input type="checkbox"/> cutting <input type="checkbox"/> grinding <input type="checkbox"/> drilling <input type="checkbox"/> hammering <input type="checkbox"/> welding <input type="checkbox"/> punch press operations <input type="checkbox"/> other: _____	Work-related exposure to: <input type="checkbox"/> airborne dust <input type="checkbox"/> flying particles <input type="checkbox"/> blood splashes <input type="checkbox"/> hazardous liquid chemicals <input type="checkbox"/> intense light <input type="checkbox"/> other: _____	Can hazard be eliminated without the use of PPE? Yes <input type="checkbox"/> No <input type="checkbox"/> If no, use: <input type="checkbox"/> Safety glasses <input type="checkbox"/> Side shields <input type="checkbox"/> Safety goggles <input type="checkbox"/> Dust-tight goggles <input type="checkbox"/> Shading/Filter (#_____) <input type="checkbox"/> Welding shield <input type="checkbox"/> Other: _____
FACE		
Personal or nearby work activities, such as: <input type="checkbox"/> cleaning <input type="checkbox"/> foundry work <input type="checkbox"/> cooking <input type="checkbox"/> welding <input type="checkbox"/> siphoning <input type="checkbox"/> mixing <input type="checkbox"/> painting <input type="checkbox"/> pouring molten metal <input type="checkbox"/> dip tank operations <input type="checkbox"/> other: _____	Work-related exposure to: <input type="checkbox"/> hazardous liquid chemicals <input type="checkbox"/> extreme heat/cold <input type="checkbox"/> potential irritants: _____ <input type="checkbox"/> other: _____	Can hazard be eliminated without the use of PPE? Yes <input type="checkbox"/> No <input type="checkbox"/> If no, use: <input type="checkbox"/> Face shield <input type="checkbox"/> Shading/Filter (#_____) <input type="checkbox"/> Welding shield <input type="checkbox"/> Other: _____

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HEAD		
<p><u>Personal or nearby work activities, such as:</u></p> <input type="checkbox"/> building maintenance <input type="checkbox"/> confined space operations <input type="checkbox"/> construction <input type="checkbox"/> electrical wiring <input type="checkbox"/> operating specialized patrol vehicles <input type="checkbox"/> walking/working under catwalks <input type="checkbox"/> walking/working under conveyor belts <input type="checkbox"/> walking/working under crane loads <input type="checkbox"/> utility work <input type="checkbox"/> other: _____	<p><u>Work-related exposure to:</u></p> <input type="checkbox"/> beams <input type="checkbox"/> pipes <input type="checkbox"/> exposed electrical wiring or components <input type="checkbox"/> falling objects <input type="checkbox"/> potential falls <input type="checkbox"/> vehicular traffic <input type="checkbox"/> machine parts <input type="checkbox"/> other: _____	<p><u>Can hazard be eliminated without the use of PPE?</u>            Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p><u>If no, use:</u></p> <input type="checkbox"/> Protective Helmet <input type="checkbox"/> Type A (low voltage) <input type="checkbox"/> Type B (high voltage) <input type="checkbox"/> Type C <input type="checkbox"/> Bump cap (not ANSI-approved) <input type="checkbox"/> Bicycle helmet (ANSI-approved) <input type="checkbox"/> Other: _____
HANDS/ARMS		
<p><u>Personal or nearby work activities, such as:</u></p> <input type="checkbox"/> baking <input type="checkbox"/> cooking <input type="checkbox"/> climbing ladders <input type="checkbox"/> grinding <input type="checkbox"/> welding <input type="checkbox"/> working with glass <input type="checkbox"/> using computers <input type="checkbox"/> health care services <input type="checkbox"/> other: _____ <input type="checkbox"/> material handling <input type="checkbox"/> sanding <input type="checkbox"/> using cutting tools <input type="checkbox"/> sawing <input type="checkbox"/> hammering <input type="checkbox"/> foundry work	<p><u>Work-related exposure to:</u></p> <input type="checkbox"/> blood <input type="checkbox"/> irritating chemicals <input type="checkbox"/> tools or materials that could scrape, bruise, or cut <input type="checkbox"/> extreme heat/cold <input type="checkbox"/> abrasion/ laceration hazards <input type="checkbox"/> potential falls <input type="checkbox"/> other: _____	<p><u>Can hazard be eliminated without the use of PPE?</u>            Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p><u>If no, use:</u></p> <input type="checkbox"/> Gloves <input type="checkbox"/> Chemical resistance <input type="checkbox"/> Liquid/leak resistance <input type="checkbox"/> Temperature resistance <input type="checkbox"/> Abrasion/cut resistance <input type="checkbox"/> Slip resistance <input type="checkbox"/> Protective sleeves <input type="checkbox"/> Other: _____

# Personal Protective Equipment (PPE) - Tab 13

FEET/LEGS		
<u>Personal or nearby work activities, such as:</u> <input type="checkbox"/> building maintenance <input type="checkbox"/> construction <input type="checkbox"/> demolition <input type="checkbox"/> food processing <input type="checkbox"/> foundry work <input type="checkbox"/> logging <input type="checkbox"/> plumbing <input type="checkbox"/> trenching <input type="checkbox"/> use of highly flammable materials <input type="checkbox"/> welding <input type="checkbox"/> walking outdoors <input type="checkbox"/> other: _____	<u>Work-related exposure to:</u> <input type="checkbox"/> explosive atmospheres <input type="checkbox"/> explosives <input type="checkbox"/> exposed electrical wiring or components <input type="checkbox"/> heavy equipment <input type="checkbox"/> slippery surfaces <input type="checkbox"/> tools <input type="checkbox"/> other: _____	<u>Can hazard be eliminated without the use of PPE?</u> Yes <input type="checkbox"/> No <input type="checkbox"/> <u>If no, use:</u> <input type="checkbox"/> Safety shoes or boots <input type="checkbox"/> Toe protection <input type="checkbox"/> Metatarsal protection <input type="checkbox"/> Electrical protection <input type="checkbox"/> Heat/cold protection <input type="checkbox"/> Puncture resistance <input type="checkbox"/> Chemical resistance <input type="checkbox"/> Anti-slip soles <input type="checkbox"/> Leggings or chaps <input type="checkbox"/> Foot-Leg guards <input type="checkbox"/> Other: _____
BODY/SKIN		
<u>Personal or nearby work activities such as:</u> <input type="checkbox"/> baking or frying <input type="checkbox"/> battery charging <input type="checkbox"/> dip tank operations <input type="checkbox"/> fiberglass installation <input type="checkbox"/> irritating chemicals <input type="checkbox"/> foundry work <input type="checkbox"/> sawing <input type="checkbox"/> other: _____	<u>Work-related exposure to:</u> <input type="checkbox"/> chemical splashes <input type="checkbox"/> extreme heat/cold <input type="checkbox"/> sharp or rough edges <input type="checkbox"/> other: _____	<u>Can hazard be eliminated without the use of PPE?</u> Yes <input type="checkbox"/> No <input type="checkbox"/> <u>If no, use:</u> <input type="checkbox"/> Vest, Jacket <input type="checkbox"/> Coveralls, Body suit <input type="checkbox"/> Raingear <input type="checkbox"/> Apron <input type="checkbox"/> Welding leathers <input type="checkbox"/> Abrasion/cut resistance <input type="checkbox"/> Other: _____
BODY/WHOLE <sup>1</sup>		
<u>Personal or nearby work activities such as:</u> <input type="checkbox"/> building maintenance <input type="checkbox"/> construction <input type="checkbox"/> use of ladders <input type="checkbox"/> logging <input type="checkbox"/> utility work <input type="checkbox"/> directing traffic <input type="checkbox"/> other: _____	<u>Work-related exposure to:</u> <input type="checkbox"/> working from heights of 4 feet or more <input type="checkbox"/> working near water <input type="checkbox"/> working near traffic <input type="checkbox"/> other: _____	<u>Can hazard be eliminated without the use of PPE?</u> Yes <input type="checkbox"/> No <input type="checkbox"/> <u>If no, use:</u> <input type="checkbox"/> Fall Arrest/Restraint: Type: _____ <input type="checkbox"/> PFD: Type: _____ <input type="checkbox"/> High visibility apparel <input type="checkbox"/> Other: _____



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LUNGS/RESPIRATORY <sup>1</sup>		
<p><u>Personal or nearby work activities such as:</u></p> <input type="checkbox"/> cleaning <input type="checkbox"/> pouring <input type="checkbox"/> mixing <input type="checkbox"/> sawing <input type="checkbox"/> painting <input type="checkbox"/> healthcare <input type="checkbox"/> fire fighting <input type="checkbox"/> fiberglass installation <input type="checkbox"/> compressed air or gas operations <input type="checkbox"/> other: _____	<p><u>Work-related exposure to:</u></p> <input type="checkbox"/> irritating dust or particulate <input type="checkbox"/> irritating or toxic gas/vapor <input type="checkbox"/> infectious diseases <input type="checkbox"/> extreme heat <input type="checkbox"/> other: _____	<p><u>Can hazard be eliminated without the use of PPE?</u>            Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p><u>If no, use:</u>  <input type="checkbox"/> Dust/Mist Respirator: Type: _____  <input type="checkbox"/> Air Purifying Respirator: Type: _____  <input type="checkbox"/> Supplied Air Respirator: Type: _____  <input type="checkbox"/> Emergency Evacuation Respirator</p>
EARS/HEARING <sup>1</sup>		
<p><u>Personal or nearby work activities such as:</u></p> <input type="checkbox"/> generator <input type="checkbox"/> grinding <input type="checkbox"/> ventilation fans <input type="checkbox"/> machining <input type="checkbox"/> motors <input type="checkbox"/> routers <input type="checkbox"/> sanding <input type="checkbox"/> sawing <input type="checkbox"/> pneumatic equipment <input type="checkbox"/> firearms <input type="checkbox"/> punch or brake presses <input type="checkbox"/> use of conveyors <input type="checkbox"/> other: _____	<p><u>Work-related exposure to:</u></p> <input type="checkbox"/> loud noises <input type="checkbox"/> loud work environment <input type="checkbox"/> noisy machines/tools <input type="checkbox"/> punch or brake presses <input type="checkbox"/> other: _____	<p><u>Can hazard be eliminated without the use of PPE?</u>            Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p><u>If no, use:</u>  <input type="checkbox"/> Ear Muffs  <input type="checkbox"/> Ear Plugs  <input type="checkbox"/> Noise canceling devices  <input type="checkbox"/> Shooting Muffs</p>

# Personal Protective Equipment (PPE)

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### MANDATORY RESPIRATOR MEDICAL EVALUATION QUESTIONNAIRE - APPENDIX 13.2

**Mandatory** The following information must be provided by every employee who has been selected to use any type of respirator.

Your employer must allow you to answer this questionnaire during normal working hours, or at a time and place that is convenient to you. To maintain your confidentiality, your employer or supervisor must not look at or review your answers and your employer must tell you how to deliver or send this questionnaire to the health care professional who will review it. (Please print)

1. Today's date: \_\_\_\_\_
2. Employee name: \_\_\_\_\_
3. Employee age (to nearest year): \_\_\_\_\_
4. Sex (circle one): Male/Female
5. Height: \_\_\_\_\_ ft. \_\_\_\_\_ in.
6. Weight: \_\_\_\_\_ lbs.
7. Your job title: \_\_\_\_\_
8. A phone number where you can be reached by the health care professional who reviews this questionnaire (including the Area Code): \_\_\_\_\_
9. The best time to phone you at this number: \_\_\_\_\_
10. Has your employer told you how to contact the health care professional who will review this questionnaire (circle one): Yes/No
11. Check the type of respirator you will use (you may check more than one category):  
\_\_\_\_ N, R, or P disposable respirator (filter mask, non-cartridge type only)  
\_\_\_\_ Other type (for example, half- or full-face piece type, powered-air purifying, supplied-air, self-contained breathing apparatus)
12. Have you worn a respirator (circle one): Yes/No
13. If yes, what type(s): \_\_\_\_\_

**Part A. Section 2. (Mandatory)** Questions 1 through 9 below must be answered by every employee who has been selected to use any type of respirator (please circle "yes" or "no").

1. Do you *currently* smoke tobacco, or have you smoked tobacco in the last month: Yes/No
2. Have you *ever had* any of the following conditions?
  - a. Seizures: Yes/No
  - b. Diabetes (sugar disease): Yes/No
  - c. Allergic reactions that interfere with your breathing: Yes/No
  - d. Claustrophobia (fear of closed-in places): Yes/No
  - e. Trouble smelling odors: Yes/No
3. Have you *ever had* any of the following pulmonary or lung problems?
  - a. Asbestosis: Yes/No
  - b. Asthma: Yes/No
  - c. Chronic bronchitis: Yes/No
  - d. Emphysema: Yes/No
  - e. Pneumonia: Yes/No

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- f. Tuberculosis: Yes/No
- g. Silicosis: Yes/No
- h. Pneumothorax (collapsed lung): Yes/No
- i. Lung cancer: Yes/No
- j. Broken ribs: Yes/No
- k. Any chest injuries or surgeries: Yes/No
- l. Any other lung problem that you've been told about: Yes/No

4. Do you *currently* have any of the following symptoms of pulmonary or lung illness?

- a. Shortness of breath: Yes/No
- b. Shortness of breath when walking fast on level ground or walking up a slight hill or incline: Yes/No
- c. Shortness of breath when walking with other people at an ordinary pace on level ground: Yes/No
- d. Have to stop for breath when walking at your own pace on level ground: Yes/No
- e. Shortness of breath when washing or dressing yourself: Yes/No
- f. Shortness of breath that interferes with your job: Yes/No
- g. Coughing that produces phlegm (thick sputum): Yes/No
- h. Coughing that wakes you early in the morning: Yes/No
- i. Coughing that occurs mostly when you are lying down: Yes/No
- j. Coughing up blood in the last month: Yes/No
- k. Wheezing: Yes/No
- l. Wheezing that interferes with your job: Yes/No
- m. Chest pain when you breathe deeply: Yes/No
- n. Any other symptoms that you think may be related to lung problems: Yes/No

5. Have you *ever had* any of the following cardiovascular or heart problems?

- a. Heart attack: Yes/No
- b. Stroke: Yes/No
- c. Angina: Yes/No
- d. Heart failure: Yes/No
- e. Swelling in your legs or feet (not caused by walking): Yes/No
- f. Heart arrhythmia (heart beating irregularly): Yes/No
- g. High blood pressure: Yes/No
- h. Any other heart problem that you've been told about: Yes/No

6. Have you *ever had* any of the following cardiovascular or heart symptoms?

- a. Frequent pain or tightness in your chest: Yes/No
- b. Pain or tightness in your chest during physical activity: Yes/No
- c. Pain or tightness in your chest that interferes with your job: Yes/No
- d. In the past two years, have you noticed your heart skipping or missing a beat: Yes/No
- e. Heartburn or indigestion that is not related to eating: Yes/No
- d. Any other symptoms that you think may be related to heart or circulation problems: Yes/No

7. Do you *currently* take medication for any of the following problems?

- a. Breathing or lung problems: Yes/No
- b. Heart trouble: Yes/No
- c. Blood pressure: Yes/No
- d. Seizures: Yes/No

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8. If you've used a respirator, have you *ever had* any of the following problems? (If you've never used a respirator, check the following space and go to question 9.)
- a. Eye irritation: Yes/No
  - b. Skin allergies or rashes: Yes/No
  - c. Anxiety: Yes/No
  - d. General weakness or fatigue: Yes/No
  - e. Any other problem that interferes with your use of a respirator: Yes/No
9. Would you like to talk to the health care professional who will review this questionnaire about your answers to this questionnaire: Yes/No

Questions 10 to 15 below must be answered by every employee who has been selected to use either a full-facepiece respirator or a self-contained breathing apparatus (SCBA). For employees who have been selected to use other types of respirators, answering these questions is voluntary.

10. Have you *ever lost* vision in either eye (temporarily or permanently): Yes/No
11. Do you *currently* have any of the following vision problems?
- a. Wear contact lenses: Yes/No
  - b. Wear glasses: Yes/No
  - c. Color blind: Yes/No
  - d. Any other eye or vision problem: Yes/No
12. Have you *ever had* an injury to your ears, including a broken ear drum: Yes/No
13. Do you *currently* have any of the following hearing problems?
- a. Difficulty hearing: Yes/No
  - b. Wear a hearing aid: Yes/No
  - c. Any other hearing or ear problem: Yes/No
14. Have you *ever had* a back injury: Yes/No
15. Do you *currently* have any of the following musculoskeletal problems?
- a. Weakness in any of your arms, hands, legs, or feet: Yes/No
  - b. Back pain: Yes/No
  - c. Difficulty fully moving your arms and legs: Yes/No
  - d. Pain or stiffness when you lean forward or backward at the waist: Yes/No
  - e. Difficulty fully moving your head up or down: Yes/No
  - f. Difficulty fully moving your head side to side: Yes/No
  - g. Difficulty bending at your knees: Yes/No
  - h. Difficulty squatting to the ground: Yes/No
  - i. Climbing a flight of stairs or a ladder carrying more than 25 lbs: Yes/No
  - j. Any other muscle or skeletal problem that interferes with using a respirator: Yes/No

**Part B** Any of the following questions, and other questions not listed, may be added to the questionnaire at the discretion of the health care professional who will review the questionnaire.

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1. In your present job, are you working at high altitudes (over 5,000 feet) or in a place that has lower than normal amounts of oxygen: Yes/No

If "yes," do you have feelings of dizziness, shortness of breath, pounding in your chest, or other symptoms when you're working under these conditions: Yes/No

2. At work or at home, have you ever been exposed to hazardous solvents, hazardous airborne chemicals (e.g., gases, fumes, or dust), or have you come into skin contact with hazardous chemicals: Yes/No

If "yes," name the chemicals if you know them: \_\_\_\_\_

3. Have you ever worked with any of the materials, or under any of the conditions, listed below:

- a. Asbestos: Yes/No
- b. Silica (e.g., in sandblasting): Yes/No
- c. Tungsten/cobalt (e.g., grinding or welding this material): Yes/No
- d. Beryllium: Yes/No
- e. Aluminum: Yes/No
- f. Coal (for example, mining): Yes/No
- g. Iron: Yes/No
- h. Tin: Yes/No
- i. Dusty environments: Yes/No
- j. Any other hazardous exposures: Yes/No

If "yes," describe these exposures: \_\_\_\_\_

4. List any second jobs or side businesses you have: \_\_\_\_\_

5. List your previous occupations: \_\_\_\_\_

6. List your current and previous hobbies: \_\_\_\_\_

7. Have you been in the military services? Yes/No

If "yes," were you exposed to biological or chemical agents (either in training or combat): Yes/No

8. Have you ever worked on a HAZMAT team? Yes/No

9. Other than medications for breathing and lung problems, heart trouble, blood pressure, and seizures mentioned earlier in this questionnaire, are you taking any other medications for any reason (including over-the-counter medications): Yes/No

If "yes," name the medications if you know them: \_\_\_\_\_

10. Will you be using any of the following items with your respirator(s)?

- a. HEPA Filters: Yes/No
- b. Canisters (for example, gas masks): Yes/No
- c. Cartridges: Yes/No

11. How often are you expected to use the respirator(s) (circle "yes" or "no" for all answers that apply to you)?:

- a. Escape only (no rescue): Yes/No
- b. Emergency rescue only: Yes/No
- c. Less than 5 hours *per week*: Yes/No

# Personal Protective Equipment (PPE)

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d. Less than 2 hours *per day*: Yes/No

e. 2 to 4 hours per day: Yes/No

f. Over 4 hours per day: Yes/No

12. During the period you are using the respirator(s), is your work effort:

**a. Light** (less than 200 kcal per hour): Yes/No

If "yes," how long does this period last during the average shift: \_\_\_\_\_ hrs. \_\_\_\_\_ mins.

Examples of a light work effort are *sitting* while writing, typing, drafting, or performing light assembly work; or *standing* while operating a drill press (1-3 lbs.) or controlling machines.

**b. Moderate** (200 to 350 kcal per hour): Yes/No

If "yes," how long does this period last during the average shift: \_\_\_\_\_ hrs. \_\_\_\_\_ mins.

Examples of moderate work effort are *sitting* while nailing or filing; *driving* a truck or bus in urban traffic; *standing* while drilling, nailing, performing assembly work, or transferring a moderate load (about 35 lbs.) at trunk level; *walking* on a level surface about 2 mph or down a 5-degree grade about 3 mph; or *pushing* a wheelbarrow with a heavy load (about 100 lbs.) on a level surface.

**c. Heavy** (above 350 kcal per hour): Yes/No

If "yes," how long does this period last during the average shift: \_\_\_\_\_ hrs. \_\_\_\_\_ mins.

Examples of heavy work are *lifting* a heavy load (about 50 lbs.) from the floor to your waist or shoulder; working on a loading dock; *shoveling*; *standing* while bricklaying or chipping castings; *walking* up an 8-degree grade about 2 mph; climbing stairs with a heavy load (about 50 lbs.).

13. Will you be wearing protective clothing and/or equipment when you're using your respirator: Yes/No

If "yes," describe this protective clothing and/or equipment: \_\_\_\_\_

14. Will you be working under hot conditions (temperature exceeding 77 deg. F): Yes/No

15. Will you be working under humid conditions: Yes/No

16. Describe the work you'll be doing while you're using your respirator(s):  
\_\_\_\_\_

17. Describe any special or hazardous conditions you might encounter when you're using your respirator(s) (for example, confined spaces, life-threatening gases): \_\_\_\_\_

18. Provide the following information, if you know it, for each toxic substance that you'll be exposed to when you're using your respirator(s):

Name of the first toxic substance: \_\_\_\_\_

Estimated maximum exposure level per shift: \_\_\_\_\_

Duration of exposure per shift: \_\_\_\_\_

Name of the second toxic substance: \_\_\_\_\_

Estimated maximum exposure level per shift: \_\_\_\_\_

Duration of exposure per shift: \_\_\_\_\_

Name of the third toxic substance: \_\_\_\_\_

Estimated maximum exposure level per shift: \_\_\_\_\_

Duration of exposure per shift: \_\_\_\_\_

The name of any other toxic substances that you'll be exposed to while using your respirator:  
\_\_\_\_\_

19. Describe any special responsibilities you'll have while using your respirator(s) that may affect the safety and well-being of others (for example, rescue, security): \_\_\_\_\_

# Personal Protective Equipment (PPE)

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### Sample Respiratory Protection Program - Appendix 13.3

#### Notice of Template:

The purpose of this document is to aid in the development of a site-specific written respiratory protection program. This outline addresses basic elements required for compliance with the federal OSHA standard 1910.134. The template must be customized in order to create a site-specific written respiratory protection program: All text fields must be edited.

**Site Name:** \_\_\_\_\_  
Respiratory Protection Program

#### TABLE OF CONTENTS

- 1.0 Purpose
- 2.0 Scope and Application
- 3.0 Responsibilities
  - Program Administrator
  - Supervisors
  - Employees
- 4.0 Program Elements
  - Selection Procedures
  - Medical Evaluation
  - Fit Testing
  - Respirator Use
  - Air Quality
  - Cleaning, Maintenance, Change Schedules and Storage
  - Training
- 5.0 Program Evaluation
- 6.0 Documentation and Recordkeeping

# Personal Protective Equipment (PPE)

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### 1.0 - PURPOSE

Allied Universal (AU) has determined that employees at the

Site Name	
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may be exposed to respiratory hazards during routine tasks or emergency operations. These hazards include

List respirable hazards at the site such as particulates, dusts, vapors, etc.	
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The purpose of this program is to ensure that all AU employees are protected from exposure to these respiratory hazards.

Engineering controls, such as ventilation and substitution of less toxic materials utilized where the site operator makes these controls available as the first line of defense to prevent exposure to respirable hazards; however, engineering controls have not always been feasible for some of our operations or have not always completely controlled the identified hazards. In these situations, respirators and other protective equipment must be used. Respirators are also needed to protect employees' health during emergencies. The job posts requiring respirator use at the site are outlined in Table 1 in the Scope and Application section of this program.

The program also addresses situations where employees may request to wear respirators during certain operations that do not require respiratory protection. As a general policy, AU will only permit the voluntary use of dust masks (N-95) style respirators, when approved by the local Program Administrator.

### 2.0 - SCOPE AND APPLICATION

This program applies to all employees who are required to wear respirators during normal work operations and during some non-routine or emergency operations. This includes employees performing job tasks as detailed in Table 1. All employees working in these areas or tasks must be enrolled in the company's respiratory protection program.

In addition, an employee who has been given advanced approval to voluntarily wear a dust mask (N-95) style respirator, when a respirator is not required, is required to follow the requirement detailed in the *Voluntary Respirator Use* section of this program.

Employees required to participate in the respiratory protection program do so at no cost to them. All expenses associated with training, medical evaluations and respiratory protection equipment will be borne by the company. Employees who voluntarily participate in the respiratory protection program will incur the expense of providing their own dust mask (N-95) respirators.



# Personal Protective Equipment (PPE)

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TABLE 1	
<i>REQUIRED RESPIRATOR USE AT [SITE NAME]</i>	
<i>Respirator type</i>	<i>List post &amp; job tasks requiring respirators</i>
Filtering face piece (N-95 or dust mask)	
Half-face piece APR or PAPR with p100 filter	
SAR, pressure demand, with auxiliary SCBA	
Continuous flow SAR with hood / PAPR	
Half-face piece APR with organic vapor cartridge	
Escape SCBA	

**Table 1 Instructions:** Fill in Table 1 to list site-specific requirements. If any respirators are not used on your site, write “N/A.” Edit the right column for all remaining rows to specify the posts and tasks where the respirator is required. This is a key part of the program, to be completed accurately. Upon completion, delete these instructions from the text of the program.

### 3.0 - RESPONSIBILITIES

#### Program Administrator

The Program Administrator is the Allied Universal Manager responsible for administering the respiratory protection program at this site. Duties of the program administrator include:

- Identify work areas, processes or tasks that require workers to wear respirators, and evaluating hazards.
- Select appropriate respiratory protection options.
- Monitor respirator use to ensure that respirators are used in accordance with the manufacturer’s recommendations and their certifications.
- Arrange for and/or conducting training.
- Verify proper storage, maintenance and/or replacement of respiratory protection equipment.
- Arrange for qualitative or quantitative fit testing as required by the type of respirator.
- Administer the medical surveillance and fit testing processes.

# Personal Protective Equipment (PPE)

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- Maintain records required by the program.
- Evaluate the program periodically.
- Update written program, as needed.
- Evaluate requests for voluntary respirator use and provide response in writing within 7 days.
- Provide all voluntary users with Appendix D of the OSHA standard 191.134.

The Respiratory Protection Program Administrator for

Site Name	
Administrator's Name	

### Supervisors

Supervisors are responsible for ensuring that the respiratory protection program is implemented in their particular areas. In addition to being knowledgeable about the program requirements for their own protection, supervisors must also ensure that the program is understood and followed by the employees under their charge. Duties of the supervisor include:

- Provide employees under their supervision (including new hires) with appropriate training, fit testing, and annual medical evaluation.
- Provide the appropriate respirators (make, model and size) and accessories.
- Be aware of tasks requiring the use of respiratory protection.
- Enforce the proper use of respiratory protection when necessary.
- Oversee the routine proper storage, maintenance and/or replacement of respiratory protection equipment.
- Address any situation where a respirator does not fit well or causes discomfort. Address facial hair and concerns related to a tight-fitting face piece with Human Resources.
- Monitor work areas and operations to identify respiratory hazards.
- Coordinate with the Program Administrator on how to address respiratory hazards or other concerns regarding the program.

### Employees

Each employee has the responsibility to wear his or her respirator when and where required and in the manner in which they were trained. Employees must also:

- Care for and maintain their respirators as instructed, dispose of respirators as trained and/or store them in a clean sanitary location.
- Maintain clean-shaved facial skin in the area where a tight-fitted respirator will create a seal on the face, as was present during the respirator fit test, to maintain the effectiveness of the seal.
- Inform their supervisor if the respirator is defective, damaged or no longer fits well, and request a new one that fits properly.
- Inform their supervisor or the Program Administrator of any respiratory hazards that they feel are not adequately addressed in the workplace and of any other concerns that they have regarding the program.

# Personal Protective Equipment (PPE)

## Tab 13

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### 4.0 - PROGRAM ELEMENTS

#### Selection Procedures

The Program Administrator will select respirators to be used on site based on the hazards to which workers are exposed and in accordance with OSHA standard 1910.134. The Program Administrator will conduct a hazard evaluation for each operation, process, or work area where airborne contaminants may be present in routine operations or during an emergency. The hazard evaluation will be documented on the PPE Hazard Assessment Form (Appendix 13.1 of Safety Manual Tab 13); assessment considerations shall include:

- 1) Identification of hazardous substances or agents to which employees could be exposed in the workplace, by security post assignment. This may include the material, as well as the frequency and duration of exposure. Where industrial hygiene monitoring is required to assess the risk, the Program Administrator will consult with the site operator to hire a consultant or use the client's qualified personnel to conduct such monitoring.
- 2) Evaluation of the effectiveness of engineering and administrative controls to prevent employee exposure to respiratory hazards. This may involve consultation with the client's safety department.
- 3) Determination of what respiratory protection may be needed based on hazards, current controls in place and additional protection needs for both routine and non-routine (or emergency) operations.

The results of the current hazard evaluation are as follows:

<p><b>Post/Procedure:</b> Expand upon Table 1 here; describe what respiratory protection is required or permitted based on the potential hazards identified via the hazard assessment, in which locations and during what activities.</p>
<p>Example: Due to the potential to come into physical contact with a person infected with Tuberculosis, all security professionals working in the Emergency Department shall be included in the Respiratory Protection Program. All security professionals will be required to successfully complete a respirator fit test for the specific respirator they will use. Prior to physical contact with any individual, security professionals are required to don their N-95 respirator.</p>

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### Updating the Hazard Assessment

The Program Administrator must revise and update the hazard assessment as needed any time work process changes may potentially affect exposure, including but not limited to changes in the contaminant, work procedure, proximity, duration or frequency of exposure, etc. If an employee feels that respiratory protection is needed during a particular activity, he/she is to contact his or her supervisor or the Program Administrator. The Program Administrator will then communicate the results of that assessment back to the employees. If it is determined that respiratory protection is necessary, all other elements of this program will be in effect for those tasks and this program will be updated accordingly.

### NIOSH Certification

All respirators to be used by AU employees must be certified by the National Institute for Occupational Safety and Health (NIOSH) and shall be used in accordance with the terms of that certification. Also, all filters, cartridges, and canisters must be labeled with the appropriate NIOSH approval label. The label must not be removed or defaced while it is in use.

### Voluntary Respirator Use

With advanced written request and approval, employees may be permitted to voluntarily wear a N-95 filtering respirator. The Program Administrator will review each voluntary use request on a case-by-case basis. If the use of a dust mask in a specific environment or task will jeopardize the health or safety of the worker(s), the Program Administrator will deny the request to use a respirator. Employees who have received approval to voluntarily use an N-95 respirator will provide their own equipment and replacements. As outlined in the Scope and Application section of this program, voluntary respirator use is subject to certain requirements of this program.

- The Program Administrator will evaluate voluntary respirator use requests on a case-by-case basis, depending on specific workplace conditions and be sure that the respirator itself will not create a hazard. A written response will be provided to the requestor within 7 days.
- The Program Administrator will provide all employees who are permitted to voluntarily wear a N-95 dust mask respirator with a copy of Appendix D of the OSHA standard 1910.34. Appendix D details the requirements for voluntary use of respirators by employees.
- Employees who are permitted to voluntarily wear an N-95 dust mask respirator must complete respirator training prior to use of the respirator in the workplace and wear/replace the respirator in compliance with manufacturer's instructions.
- Other elements of this program, including medical evaluation, respirator cleaning, maintenance, and storage are NOT applicable to those who voluntarily use a N-95 style respirator, as specified in 1910.134(c)(2)(ii).

### Medical Evaluation

Employees who are required to wear a respirator as part of this program must pass a medical exam before being permitted to wear a respirator on the job. Employees are not permitted to wear respirators until a physician has determined that they are medically able to do so. Any employee refusing the medical evaluation will not be allowed to work in an area requiring respirator use.

A licensed physician at the local medical provider, where all respirator medical evaluations are provided at the site, will provide the medical evaluations. Medical evaluation procedures are bulleted below:

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Local Medical Provider Name	
Site Name	

- The medical evaluation will be conducted using the questionnaire provided in Appendix 13.2 of Tab 13 of the Allied Universal corporate Safety Manual. The Program Administrator will provide a copy of this questionnaire to all employees requiring medical evaluations.
- All affected employees will be given a copy of the medical questionnaire to fill out, along with a stamped and addressed envelope for mailing the questionnaire to the medical provider. Employees will be permitted to fill out the questionnaire on company time with confidentiality and mail the completed document directly to the medical provider so that no other AU employee, supervisor or manager may view their questionnaire.
- Follow-up medical exams will be granted to employees as required by the standard, and/or as deemed necessary by

Local Medical Provider Name	
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- All employees will be granted the opportunity to speak with the physician about their medical evaluation, if they so request.
- The Program Administrator has provided the local medical provider with a copy of this program, a copy of the Respiratory Protection standard, the list of hazardous substances by work area, and for each employee requiring evaluation: his or her work area or job title, proposed respirator type and weight, length of time required to wear respirator, expected physical work load (light, moderate, or heavy), potential temperature and humidity extremes, and any additional protective clothing required.
- After an employee has received medical clearance and begun to wear his/her respirator, additional medical evaluations will be provided under the following circumstances:
  - If the employee reports signs and/or symptoms related to their ability to use a respirator, such as shortness of breath, dizziness, chest pains, or wheezing.
  - If the physician or supervisor informs the Program Administrator that the employee needs to be reevaluated;
  - If information from this program, including observations made during fit testing and program evaluation, indicates a need for reevaluation;
  - If a change occurs in workplace conditions that may result in an increased physiological burden on the employee.

A list of AU employees currently included in medical surveillance will be maintained confidentially by the Program Administrator.

All examinations and questionnaires are to remain confidential between the employee and the physician.

### Fit Testing

Employees who are required to wear any respirator with a tight-fitting face piece will be required to complete and pass the specified fit specified for the respirator that they will use in the workplace:

- Prior to being allowed to use that type of respirator.
- Annually
- When there are changes in the employee's physical condition that could affect respiratory fit (e.g., obvious change in body weight, facial scarring, etc).

Employees will be fit tested with the make, model, and size of respirator that they will actually wear in the workplace. Employees will be provided with several models and sizes of respirators if needed to find an optimal fit. Fit testing of PAPRs is to be conducted in the negative pressure mode.

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The Program Administrator will confirm that all fit testing is conducted in accordance with requirements listed in 29 CFR 1910.134 Appendix 2.1.

### Respirator Use

#### General Use Procedures

- Employees will use their respirators under conditions specified by this program, and in accordance with the training they receive on the use of each particular model. In addition, the respirator shall not be used in a manner for which it is not certified by NIOSH or by its manufacturer.
- Employees are not permitted to wear tight-fitting respirators if they have any condition, such as facial scars, facial hair or missing dentures, that prevents them from achieving an adequate seal to pass a fit test for the respirator which will be worn in the workplace. Employees are not permitted to wear headphones, jewelry, or other articles that may interfere with the face piece-to-face seal.
- All employees shall conduct user seal checks to ensure that an adequate seal is achieved each time that they wear their respirator. Employees shall use either the positive or negative pressure check method. User seal checks are not substitutes for qualitative or quantitative fit tests.
  - I. Facepiece Positive and/or Negative Pressure Checks
    - A. Positive pressure check. Close off the exhalation valve and exhale gently into the facepiece. The face fit is considered satisfactory if a slight positive pressure can be built up inside the facepiece without any evidence of outward leakage of air at the seal. For most respirators this method of leak testing requires the wearer to first remove the exhalation valve cover before closing off the exhalation valve and then carefully replacing it after the test.
    - B. Negative pressure check. Close off the inlet opening of the canister or cartridge(s) by covering with the palm of the hand(s) or by replacing the filter seal(s), inhale gently so that the facepiece collapses slightly, and hold the breath for ten seconds. The design of the inlet opening of some cartridges cannot be effectively covered with the palm of the hand. The test can be performed by covering the inlet opening of the cartridge with a thin latex or nitrile glove. If the face piece remains in its slightly collapsed condition and no inward leakage of air is detected, the tightness of the respirator is considered satisfactory.

#### Emergency Procedures

The following work areas have been identified as having foreseeable emergencies:

**List work areas and type of foreseeable emergency requiring respiratory protection.**

Provide written instruction for how employees will be notified of the emergency situation and what actions they are to take.

Example 1: Production areas G & H – potential release of chemical XYZ. When the alarm sounds, employees in the affected department must immediately don their emergency escape respirator, shut down their process equipment, and exit the work area. All other employees must immediately evacuate the building. XYZ Company's Emergency Action Plan describes these procedures (including proper evacuation routes and rally points) in greater detail.

Example 2: Emergency escape respirators are located in Locker #1 in the Spray Booth area. Respiratory protection in these instances is for escape purposes only. Allied Universal

# Personal Protective Equipment (PPE)

## Tab 13

security professionals are not trained as emergency responders, and are not authorized to act in such a manner.

### Respirator Malfunction

#### 1. APR Respirator Malfunction:

For any malfunction of an APR (e.g., such as contaminant breakthrough, face piece leakage, or improperly working valve), the respirator wearer should inform his or her supervisor that the respirator no longer functions as intended, and go to the designated safe area to maintain the respirator. The supervisor must ensure that the employee receives the needed parts to repair the respirator, or is provided with a new respirator.

#### 2. Atmosphere-supplying Respirator Malfunction:

All workers wearing atmosphere-supplying respirators will work with a buddy. If a worker experiences a malfunction of an SAR, he or she should signal to the buddy that he/she has had a respirator malfunction. The buddy shall don an emergency escape respirator and aid the worker immediately.

### IDLH Procedures

The Program Administrator has identified the following area as having the potential for IDLH conditions:

**List work areas where potential for an IDLH atmosphere has been identified.** Provide written instruction for how employees will proceed to use their respirator in such conditions.

Example: Permit Required Confined Space Rescuers – Allied Universal security professionals working as a Permit Required Confined Space (PRCS) Rescuer may encounter a situation where they must enter a PRCS. As specified in the site-specific PRCS procedure, no employee may pass the plane of entry without first donning their SAR.

### Air Quality

For supplied-air respirators, only Grade D breathing air shall be used in the cylinders. The Program Administrator will coordinate deliveries of compressed air with the company's vendor and require the vendor to certify that the air in the cylinders meets the specifications of Grade D breathing air.

Vendor Name	
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The Program Administrator will maintain a minimum air supply of one fully charged replacement cylinder for each SAR unit. In addition, cylinders may be recharged as necessary from the breathing air cascade system located near the respirator storage area. The air for this system is provided by the vendor, and deliveries of new air are coordinated by the Program Administrator.

### Cleaning, Maintenance, Change Schedules and Storage

# Personal Protective Equipment (PPE)

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### Cleaning

Respirators are to be regularly cleaned and disinfected in the following area(s):

List Locations:	
-----------------	--

Respirators issued for the exclusive use of an employee shall be cleaned as often as necessary, but at least once each day the respirator is used.

Atmosphere supplying and emergency use respirators are to be cleaned and disinfected after each use.

The following procedure is to be used when cleaning and disinfecting respirators:

1. Disassemble respirator, removing any filters, canisters, or cartridges. Disassemble face pieces by removing speaking diaphragms, demand and pressure-demand valve assemblies, hoses, or any components recommended by the manufacturer. Discard and repair any defective parts.
2. Wash the facepiece and associated parts in a mild detergent with warm water. Do not use organic solvents. A stiff bristle (not wire) brush may be used to facilitate the removal of dirt.
  - o When the cleaner does not contain a disinfecting agent, respirator components should be immersed for two minutes in one of the following:
    - Hypochlorite solution (50 ppm of chlorine) made by adding approximately one milliliter of laundry bleach to one liter of water at 110 degrees Fahrenheit.
    - Other commercially available cleansers of equivalent disinfectant quality when used as directed, if their use is recommended or approved by the respirator manufacturer.
3. Rinse components completely in clean warm running water. Drain. The importance of thoroughly rinsing cannot be overemphasized. Detergents or disinfectants that dry on face pieces may result in dermatitis. Additionally, some disinfectants may cause deterioration of rubber or corrosion of metal parts if not completely removed.
4. Wipe the respirator with disinfectant wipes (70% Isopropyl Alcohol) to kill germs.
5. Components should be air-dried or hand-dried with a clean lint-free cloth.
6. Reassemble the respirator and replace any filters, cartridges or defective parts.
7. Place in a clean, dry plastic bag or other airtight container.
8. Test the respirator to ensure that all components work properly.

Note: The Program Administrator will ensure an adequate supply of appropriate cleaning and disinfecting material at the cleaning station. If supplies are low, employees should contact their supervisor, who will inform the Program Administrator.

### Maintenance

Respirators are to be properly maintained at all times in order to ensure that they function properly and adequately protect the employee. Maintenance involves a thorough visual inspection for cleanliness and defects. Worn or deteriorated parts will be replaced prior to use. No components will be replaced or repairs made beyond those recommended by the manufacturer. Repairs to regulators



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or alarms of atmosphere-supplying respirators will be conducted by the manufacturer. The following checklist will be used when inspecting respirators:

- Facepiece:
  - Cracks, tears, or holes
  - Facemask distortion
  - Cracked or loose lenses/faceshield
- Headstraps:
  - Breaks or tears
  - Broken buckles
- Valves:
  - Residue or dirt
  - Cracks or tears in valve material
- Filters/Cartridges:
  - Approval designation
  - Gaskets
  - Cracks or dents in housing
  - Proper cartridge for hazard
- Air Supply Systems:
  - Breathing air quality/grade
  - Condition of supply hoses
  - Hose connections
  - Settings on regulators and valves

Employees are permitted to leave their work area to perform limited maintenance on their respirator in a designated area that is free of respiratory hazards. Situations when this is permitted include to wash their face and respirator facepiece to prevent any eye or skin irritation, to replace the filter, cartridge or canister, and if they detect vapor or gas breakthrough or leakage in the facepiece or if they detect any other damage to the respirator or its components.

### Change Schedules

Employees wearing APRs or PAPRs with P100 filters for protection against wood dust and other particulates shall change the cartridges on their respirators when they first begin to experience difficulty breathing (i.e., resistance) while wearing their masks.

### Storage

Respirators must be stored in a clean, dry area, and in accordance with the manufacturer's recommendations. Each employee will clean and inspect their own air-purifying respirator in accordance with the provisions of this program and will store their respirator in a plastic bag in the designated location. Each employee will have his/her name on the bag and that bag will only be used to store that employee's respirator.

Atmosphere supplying respirators will be stored in the storage cabinet outside the Program Administrator's office.

The Program Administrator will store the supply of respirators and respirator components in their original manufacturer's packaging in the equipment storage room.

### Defective Respirators

Respirators that are defective or have defective parts shall be taken out of service immediately. If, during an inspection, an employee discovers a defect in a respirator, he/she is to bring the defect to

# Personal Protective Equipment (PPE)

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the attention of his or her supervisor. Supervisors will give all defective respirators to the Program Administrator. The Program Administrator will decide whether to:

- Temporarily take the respirator out of service until it can be repaired.
- Perform a simple fix on the spot, such as replacing a headstrap.
- Dispose of the respirator due to an irreparable problem or defect.

When a respirator is taken out of service for an extended period of time, the respirator will be tagged out of service, and the employee will be given a replacement of similar make, model, and size. All tagged out respirators will be kept in the storage cabinet inside the Program Administrator office.

### Training

The Program Administrator will provide training to respirator users and their supervisors on the contents of this Respiratory Protection Program and their responsibilities under it. Employees, including those who have received approval to voluntarily wear an N-95 respirator, will complete training prior to using a respirator in the workplace. Supervisors will also be trained prior to using a respirator in the workplace or prior to supervising employees that must wear respirators.

The training course will cover the following topics:

- This Respiratory Protection Program
- Respiratory hazards encountered in the workplace and their health effects
- Proper selection and use of respirators
- Limitations of respirators
- Respirator donning and user seal (fit) checks
- Fit testing
- Emergency use procedures
- Maintenance and storage
- Medical signs and symptoms limiting the effective use of respirators

Employees will complete training initially upon assignment to respirator use, and will complete refresher training annually, or more frequently as needed (e.g., if they change departments and need to use a different respirator). Employees must demonstrate their understanding of the topics covered in the training through hands-on exercises and a written test with a minimum passing score of 80% to successfully complete the training.

Respirator training will be documented by the Program Administrator and the documentation will include the type, model, and size of respirator for which each employee has been trained and fit tested. Upon successful completion of each training session, the Program Administrator will document completion in WinTeam using compliance code "PPE-Respirator Training" and referencing the specific respirator information in the Notes section, as well as maintaining in the employees' file a copy of the training syllabus along with the graded assessment.

### 5.0 - PROGRAM EVALUATION

The Program Administrator will conduct periodic evaluations of the workplace to ensure that the provisions of this program are being implemented. The evaluations will include consultations with employees who use respirators and their supervisors, site inspections and a review of records.

Problems identified will be noted in an inspection log and addressed by the Program Administrator. These findings will be reported to local management, and the report will list plans to correct deficiencies in the respirator program and target dates for the implementation of those corrections.

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## 6.0 - DOCUMENTATION AND RECORDKEEPING

# Personal Protective Equipment (PPE)

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A written copy of this program is kept in the Program Administrator's office and is available to all employees who wish to review it. Also maintained in the Program Administrator's office are copies of training and fit test records.

Records will be updated as new employees are trained, as existing employees receive refresher training, and as new fit tests are conducted. Complete training documentation/records for each individual employee, for each instance of training/retaining including: the course syllabus/outline, the completed written test, a validation of the employee successfully demonstrating hands-on use of the equipment, a compliance code update in WinTeam and fit test documentation.

The Program Administrator will also maintain copies of the medical records for all employees covered under the respirator program. The completed medical questionnaire and the physician's documented findings are confidential and will remain at Local Medical Provider. The Program Administrator will only retain the physician's written recommendation regarding each employee's ability to wear a respirator.

The medical and fit test records will be maintained in compliance with Tab 17 of the corporate Safety Manual (Access to Employee Medical and Exposure Records).

**“OSHA 1910.134 Appendix D”  
Allied Universal Respiratory Protection Program  
Mandatory Form for Voluntary Use of a N-95 Respirator**

Appendix D to Sec. 1910.134 (Mandatory) Information for Employees Using Respirators When Not Required Under the Standard

Respirators are an effective method of protection against designated hazards when properly selected and worn. Respirator use is encouraged, even when exposures are below the exposure limit, to provide an additional level of comfort and protection for workers. However, if a respirator is used improperly or not kept clean, the respirator itself can become a hazard to the worker. Sometimes, workers may wear respirators to avoid exposures to hazards, even if the amount of hazardous substance does not exceed the limits set by OSHA standards. If your employer provides respirators for your voluntary use, or if you provide your own respirator, you need to take certain precautions to be sure that the respirator itself does not present a hazard.

You should do the following:

1. Read and heed all instructions provided by the manufacturer on use, maintenance, cleaning and care, and warnings regarding the respirators limitations.
2. Choose respirators certified for use to protect against the contaminant of concern. NIOSH, the National Institute for Occupational Safety and Health of the U.S. Department of Health and Human Services, certifies respirators. A label or statement of certification should appear on the respirator or respirator packaging. It will tell you what the respirator is designed for and how much it will protect you.
3. Do not wear your respirator into atmospheres containing contaminants for which your respirator is

# Personal Protective Equipment (PPE)

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not designed to protect against. For example, a respirator designed to filter dust particles will not protect you against gases, vapors, or very small solid particles of fumes or smoke.

4. Keep track of your respirator so that you do not mistakenly use someone else's respirator.

[63 FR 1152, Jan. 8, 1998; 63 FR 20098, April 23, 1998]

<b>Name of Employee:</b>	
<b>My signature here is confirmation that I have received a personal copy of this form:</b>	
<b>Date of Receipt:</b>	
<b>Name of Program Administrator:</b>	
<b>Signature of Program Administrator:</b>	

# Hearing Conservation

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### PURPOSE

The purpose of this policy is to protect and conserve the hearing levels of all Allied Universal employees. As needed a site-specific hearing conservation will be developed as outlined by this document.

### SCOPE

This policy applies to all employees at any work site. The Hearing Conservation policy outlines basic expectations to be enacted that will prevent exposure to unacceptable noise levels in the workplace. The elements of this policy, and any site-specific hearing conservation programs developed through use of this policy, will comply with OSHA's general industry standard, Occupational Noise Exposure, 29 CFR 1910.95.

### DEFINITIONS

**Administrative Controls** - Modifications to how work is performed, such as schedules, methods, or procedures, to reduce risk of injury.

**Action Level** - An 8-hour time-weighted average of 85 decibels measured on the A-scale, slow response, or equivalently, a dose of fifty percent.

**Audiogram** - A chart, graph, or table resulting from an audiometric test showing an individual's hearing threshold levels as a function of frequency.

**Audiologist** - A professional, specializing in the study and rehabilitation of hearing, who is certified by the American Speech-Language-Hearing Association or licensed by a state board of examiners.

**Baseline Audiogram** - The audiogram against which future audiograms are compared.

**Decibel (dB)** - Unit of measurement of sound level.

**85 dBA** - This is not a definition, but an example to better understand 85 decibels. If working in an environment where one needs to shout to have a conversation with someone standing nearby, the noise level could be near the point where hearing protection may be needed. Daily noise exposures can approach or surpass 85 dBA by combining periods of low noise and periods of high noise.

**Hearing Conservation Program** - A site-specific plan that details work areas or job assignments where employees are exposed at or above the action level, initial and annual audiometric testing requirements/procedures, methods to reduce noise exposure to below 90 dBA for an eight-hour work shift, which hearing protection devices will be used, and details how training will be delivered and records will be maintained in compliance with this policy.

**Noise Dosimeter** - An instrument that integrates a function of sound pressure over a period of time in such a manner that it directly indicates a noise dose.

**Representative Exposure** - Measurements of an employee's noise dose or 8-hour time-weighted average sound level that the employers deem to be representative of the exposures of other employees in the workplace.

# Hearing Conservation

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**Sound Level Meter** - An instrument for the measurement of sound level.

**Time-weighted Average (TWA) Sound Level** – The maximum average noise exposure which occurs in an eight hour time period, as determined through sound level measurement.

### RESPONSIBILITIES

All employees in the hearing conservation program have the responsibility to:

- Inform site management of noise concerns in the workplace.
- Participate in required training sessions to understand the hearing conservation program and how to protect themselves.
- Complete audiogram tests as required by this policy.
- Appropriately utilize hearing protection devices 100% of the time while working in areas where hearing protection is required.

All managers and supervisors have the responsibility to:

- Seek ways to implement Administrative Controls to reduce exposure (duration and/or frequency) to high-noise areas.
- Determine through area or personal noise monitoring if the eight-hour TWA for Allied Universal employee posts meets or exceeds the action level. Communicate with the Risk Management department for support as needed.
- Establish a hearing conservation program, or participate in a client-led hearing conservation program, where employees are exposed at or above the action level. Communicate with the Risk Management department for support.
- Ensure that all employees in the hearing conservation program complete all audiogram as required by this policy. Communicate with the Risk Management department for support as needed.
- Ensure that hearing protectors are available as described in this policy; hold all affected employees accountable to utilize hearing protectors where required.
- Provide training as described in this policy to all employees in the hearing conservation program.

Human resources representatives have the responsibility to maintain audiometric test results (medical records), per the requirements of the Tab 17: Access to Medical and Exposure Records section of the Corporate Safety Manual.

The Risk Management department has the responsibility to:

- Update and maintain the 'Hearing Conservation' section of the Corporate Safety Manual.
- Provide support in the form of information and direction to sites where noise levels are in question and monitoring will be needed.
- Provide support in the form of information and direction to site which will develop site-specific hearing conservation programs.

# Hearing Conservation

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- Work in conjunction with Training and Development to update training content and forms as needed.
- Oversee the recordkeeping of hearing loss claims on the OSHA 300 Log.

The Training and Development department has the responsibility to:

- Develop and maintain training resources to meet or exceed the training requirements as described in this policy.
- Provide resources needed to track and record the successful completion of the training requirements as described in this policy.

### **POLICY**

Noise exposure occurs in every workplace, but high levels of noise exposure over extended periods of time can contribute to hearing loss. Noise levels that average above 85 dBA, the action level for an eight-hour work shift, can be reached when combining periods of low-level noise exposure and periods of high-level noise exposure.

Any employee exposed through their assigned work activities to a time-weighted average (TWA) noise level at or above 85dBA during an eight-hour shift will be included in the site hearing conservation program. The hearing conservation program may be focused and limited to certain posts (areas) where the action level is met or exceeded; the hearing conservation program may not affect all employees at a given site.

Whenever possible, Allied Universal will use Engineering and/or Administrative controls to minimize exposure to high noise levels by finding ways to eliminate or reduce the time where employee work activities take place near loud noise sources. At sites where these controls are insufficient to reduce the TWA to below the action level, a hearing protection program will be developed and implemented for all affected employees.

A variety of adequate hearing protectors (earplugs, earmuffs, etc.) shall be made available to employees in the hearing protection program, and will be replaced as necessary. Hearing protection will be provided at no cost to employees and will meet the requirements detailed in OSHA 29 CFR 1910.95(i)-(j) and 1910.95 Appendix B (mandatory). Site Supervisors and Managers will ensure that hearing protectors are used by employees:

- Who work in areas with recorded sound levels at or above 90 dBA
- Whose eight-hour TWA meets or exceeds 85 dBA
- Who are newly assigned to a job in the hearing conservation program and have yet to complete their baseline audiogram
- Who have experienced a standard threshold shift

Allied Universal management will work with the client to receive mutual area noise level monitoring results. When clients will not supply such data, Allied Universal is responsible to gather and maintain

# Hearing Conservation

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such area noise level monitoring. This monitoring will be conducted per OSHA 29 CFR 1910.95(d) and 1910.95 Appendix A (mandatory).

All employees who are exposed to the action level, thus included in the hearing conservation program, will receive an initial baseline audiogram within 6 months of assignment. All such employees will receive follow-up audiograms annually thereafter, so long as they continue to work in a position that places them in the hearing conservation program. All audiograms will be provided at no cost to employees and completed as specified in OSHA 29 CFR 1910.95(g) and 1910.95 Appendices C, D, and E (mandatory appendices of the OSHA regulation).

All employees required to participate in the audiogram program will be scheduled to complete their baseline audiogram so that they have a minimum of 14 consecutive hours of time free from workplace noise exposure prior to completion of baseline audiogram.

All employees in the hearing conservation program will be informed about the hearing conservation program and their participation in the program via formal training, provided initially upon assignment and annually thereafter.

In the event that an employee in the hearing conservation program were to experience a standard threshold shift, the employee will be provided these results in writing within 21 days of Allied Universal becoming aware of this result.

### **TRAINING**

All employees in a hearing conservation program will receive training initially upon assignment and annually thereafter that includes at least the following elements:

- The effects of noise on hearing.
- The purpose of hearing protectors, the advantages, disadvantages, and attenuation of various types, and instructions on selection, fitting, use and care.
- The purpose of audiometric testing and an explanation of the test procedures.

### **RECORDKEEPING**

#### **Monitoring:**

Noise exposure measurement records will include:

- The name of the site and description of specific locations monitored
- The date of the monitoring
- The name and company affiliation of the person who performed the monitoring
- The results of area noise exposure monitoring in dBA
- Noise exposure measurement records received from the client or performed on behalf of Allied Universal will be retained at the Branch Office for a minimum period of two years.



# Hearing Conservation

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### **Audiograms:**

Records will include:

- The name and job classification of the employee
- Date of the audiogram
- The examiner's name
- Date of the last acoustic or exhaustive calibration of the audiometer
- Employee's more recent noise exposure assessment

Audiometric test results will be provided to the individual employee being tested and a copy retained in the Hearing Conservation Program files for the site for a period of at least two years.

All records produced through audiograms are medical records, and retained in accordance with the Tab 17: Access to Medical and Exposure Records section of the Safety Manual.

### **TRAINING**

All training sessions, initial and annually thereafter, will be documented in WinTeam to identify:

- The name of the individual trained
- The date on which training was completed
- The results of any knowledge assessments related to the training course
- The content which was included in the training

### **OSHA RECORDKEEPING**

Claims of occupational hearing loss will be evaluated and recorded on the annual OSHA 300 Log as required by 29 CFR 1904.10 by the local OSHA Administrator, per the Tab 18: OSHA Recordkeeping section of the safety manual.

### **ACCESS AND TRANSFER OF RECORDS**

All records produced through audiograms are medical records; these records will be provided to employees, and their designated representative(s), and retained in accordance with the Tab 17: Access to Medical and Exposure Records section of the Safety Manual.

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### PURPOSE

It is the policy of Allied Universal (AU) to promote the safety of our drivers and to protect employees and the public from harm or incident that may arise from vehicle accidents. To help achieve this, the Vehicle Safety program outlines measures to authorize, educate, and monitor our drivers. Preventing injury to the public and Company employees is of paramount importance. AU is committed to establishing guidelines and taking all reasonable and necessary steps to prevent injury and property damage.

### SCOPE

The elements of this policy apply to all Allied Universal (AU) employees who operate a motor vehicle for AU business purposes, including company owned, leased, and privately owned motor vehicles. All AU employees who operate vehicles at any time while on Company business, regardless of vehicle ownership.

The comprehensive driver safety program includes:

- Responsibilities
- Driver Training
- Privileges and Authorization
- Vehicle Inspection
- Vehicle Operations Rules and Regulations
- Accident Reporting and Investigation
- Disciplinary Action

### DEFINITIONS

**Motor Vehicle** - A registered vehicle that is authorized to be driven on public roadways. This may include, but is not limited to, passenger vehicles, buses, motorcycles, etc. This does not include bicycles, Segway/T-3, ATVs, forklifts, etc.

**Earth Moving Equipment**- Also known as a loader, front loader, front end loader, bucket loader, scoop loader or shovel, is a type of tractor, usually wheeled, that uses a wide square tilting bucket on the end of movable arms to lift and move material.

**MVR** - A motor vehicle record containing a summary of a driver's traffic violations and accidents, provided by the state that issues the driver's license..

**Driver's License** - A license authorizing an individual to drive a motor vehicle, issued by the state in which the individual resides.

**Driving Position** - An AU job that requires or includes the operations of a motor vehicle in the job description.

**Annual** – records or actions that are completed within 12 months from the previous occurrence or anniversary

# Vehicle Safety

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### RESPONSIBILITIES

#### All drivers have the responsibility to:

1. Be knowledgeable of the Vehicle Safety program.
2. Possess a current and valid Driver's License, from the state in which they reside, of the proper class for the vehicle(s) being operated. In the event of the license being restricted, suspended or revoked, the employee driver will notify their Supervisor within 24 hours.
3. Wear seat belts while operating or riding in a vehicle being used for company business. Ensure that all passengers in the vehicle you operate are wearing a seat belt (some exceptions may apply to golf carts, buses, etc. where passenger seats are not equipped with seat belts.)
4. Abstain from text messaging and handheld use of mobile communication devices while driving any vehicle to conduct company business.
5. Operate all vehicles in compliance with local, state, and federal driving requirements.
6. Report any/all vehicle accidents or vehicle believed to be unsafe to operate to the Supervisor or Manager immediately.
7. Maintain adequate collision, personal injury, and property damage insurance coverage, as required by the state in which you reside, when driving a privately owned vehicle.
8. Abstain from smoking in company owned or leased vehicles.

#### All Managers and Supervisors have the responsibility to:

1. Train driving employees on the Vehicle Safety program and any site-specific procedures.
2. Set a positive example and promote driver safety.
3. Periodically observe/ assess drivers; provide constructive feedback or retraining as necessary.
4. Conduct and maintain documentation of quarterly driver's license checks of all drivers under your authority.
5. Submit the request for annual MVR checks to the Human Resources Coordinator (HRC).
6. Report any/all vehicle accidents involving a company owned or leased vehicle to current vehicle and worker's compensation reporting vendors.
7. Conduct complete and thorough investigations of employee vehicle accidents.
8. Take corrective action whenever an investigation results in a finding that a provision of this program was not in compliance.
9. Administer disciplinary action related to violations of the Vehicle Safety program, when deemed appropriate.

#### Human Resources Coordinators have the responsibility to:

1. Maintain the Corporate Operation of Vehicles policy.
2. Collect required driver information during the application process for driving candidates.
3. Assist Managers and Supervisors to determine if disciplinary action related to the requirements of this policy should be administered.
4. Complete request for MVR checks and maintain records. Provide paperwork and support to Managers and Supervisors for the annual MVR check progress and recordkeeping.

# Vehicle Safety

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### **The Risk Management department has the responsibility to:**

1. Update the Vehicle Safety program periodically as needed.
2. Provide support for this program to regional and district personnel as needed.
3. Work in conjunction with Learning and Development to update training content and forms as needed.

Work in conjunction with Strategic Sourcing to identify loss trends and methods to reduce vehicle accident risks.

### **The Training and Development department has the responsibility to:**

1. Develop and maintain materials to administer and support the Vehicle Safety program.  
Training elements may include:
  - Computer-based driver safety training
  - Hands-on driver safety training
  - Manager/Supervisor safe driving training

### **The Strategic Sourcing department has the responsibility to:**

1. Coordinate the selection, acquisition, maintenance, repair and/or replacement of all company owned or leased vehicles.
2. Maintain records of vehicle accidents and costs.
3. Identify loss trends and methods to reduce vehicle accident risks in conjunction with the Risk Management department.

## **DRIVER TRAINING PROGRAMS**

Driver Training is a mandatory prerequisite requirement to earn driving privileges to operate an Allied Universal or client vehicle. This includes account managers, shift supervisors and site supervisors responsible for driver supervision.

Mandatory vehicle training requirements include, but are not limited to:

- Successful completion of the Drivers Safety Training Program: This is a corporate training program, which is delivered in a classroom by an account, site or regional trainer using approved lesson plans and videos. This program is available through the Training Manager.
- On-the-job Training per the Designated Drivers OJT Lesson Plans: This is a hands-on, one on one training program, delivered by a site trainer using approved OJT lesson plans that have been specifically modified for the account.
- Periodic In-Service Training - Ongoing Performance Coaching
- Special Defensive Driver Information Training

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Driver training courses require a pass/fail assessment. Under no circumstances is an individual permitted to drive an Allied Universal or client-owned vehicle without successfully completing the classroom Drivers Training Program and site specific On-the-job Drivers Training Program. If a site has multiple vehicle types, authorized drivers can only drive vehicles they have been trained to drive.

Account managers or supervisors shall ride with each vehicle driver at least annually to observe driving skills and offer constructive feedback where necessary

Specific training materials for these programs are developed and maintained by the Training and Development Department. Information and details may be obtained by contacting the Corporate Training Director or any Trainer.

### **DRIVING PRIVILEGES & AUTHORIZATION**

Driving for Allied Universal is a privilege and requires that all employee drivers be familiar with and adhere to the policies and expectations outlined within the Vehicle Safety program.

For positions which require the operation of a motor vehicle as a condition of employment, the Driver Authorization process will be successfully completed before an offer of employment is extended to the candidate.

Drivers will successfully meet the following minimum requirements to earn/maintain driving privileges:

1. Initial and annual MVR review
2. Quarterly driver's license review
3. Classroom Safe Driver training
4. On-the-job training

#### **Driver Authorization:**

Before hire or assignment to a driving position, and on an annual basis thereafter, all drivers' records will be screened by the following procedure:

1. MVR checks will be conducted upon hire and annually for all personnel operating a vehicle as part of their assigned or regular workplace duties. The Account Manager/Supervisor will obtain the appropriate paperwork from the Human Resources Coordinator to submit the request for the MVR check.
2. The HR Coordinator will notify the Account Manager/Supervisor of the results of the MVR check, as applied against standards published in the Company Operation of Vehicles Policy. The HR Coordinator will also place the hard copy of the record in the employee file and enter the results in the WINTEAM performance tracking database.
3. No employee may be placed in a position requiring driving prior to receipt of an acceptable MVR check.
4. All Company employees must meet the following minimum standards in order to operate a vehicle while on Company business:

- 
- a. Hold a valid, current driver's license for the employee's state of residence,

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- b. Have valid and current proof of automobile liability insurance with policy limits set, at a minimum, at the level required by the employee's state of residence;
  - c. Have an acceptable motor vehicle record (MVR), as further described below; and sign an acknowledgement indicating the employee's understanding of this policy and agreement to abide by its requirements.
5. An employee who operates a vehicle while on Company business but fails to meet any one of the above requirements will be subject to disciplinary action including termination.
  6. Management will not knowingly permit the operation of any vehicle on behalf of the Company by an employee who fails to meet these standards. Failure of management personnel to comply with this policy may result in disciplinary action including termination.
  7. All new employees who will be driving on Company business at any time will have their MVRs processed and reviewed prior to being permitted to drive. This is defined as all employees hired into exempt and support non-exempt positions, as well as any security professional specifically responsible for driving a vehicle as part of a job. At sites where driving vehicles is a normal occurrence (malls, for instance), all employees at that site may be required to have MVRs run in preparation to fill in posts.
  8. On an annual basis MVRs will be obtained for all hourly security personnel who operate vehicles as a regular part of their Company duties. Each District (or Regional, as appropriate) office is responsible for this annual check. Additionally, the Company reserves the right to run an MVR on any employee randomly.

### **Quarterly Driver's License Checks:**

All employees operating vehicles in the performance of their work duties must have a current, valid state driver's license. Upon initial hire, the driver's license is checked and photocopied in conjunction with the request for a MVR check.

Thereafter, the Account Manager/Security Director or his or her designee will check the driver's license of all drivers at his or her work location on at least a quarterly basis to ensure that each driver has a current license in his or her possession. This inspection will be recorded on the Drivers' License Check Form. This form will be kept on file at each account and available for inspection upon request.

### **Acceptable Driving Records Standards**

Applicants for employment and existing employees who will be operating vehicles on Company business must meet the following standards as determined by a review of the MVR. The Company may, at its discretion, consider any other sources of information that may be available in reviewing an applicant's driving record.

### **Criminal Violations – None in the past 36 months**

- Leaving scene of an accident
- Driving while intoxicated/under the influence
- Illegal transport/possession of alcohol or drugs
- Fleeing police officer
- Reckless driving or drag racing
- Felony using motor vehicle

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- Causing an Accident – Not more than one (1) in the past 12 months or two (2) in the past 24 months
- Felony Moving Violations – Not more than two (2) in the past 12 months or three (3) in the past 24 months.
- Failure to wear a seat belt
- Speeding or driving too fast for conditions
- Improper passing, turning or lane usage
- Disobeyed stop/yield sign, traffic signal/device, traffic sign or officer

### VEHICLE INSPECTION

Prior to driving any Allied Universal or client vehicle each driver will inspect his or her vehicle and complete a "Vehicle Inspection Checklist". The pre-use inspection will include the following:

1. Tires are properly inflated and in good condition.
2. All lights are working correctly (i.e. headlights, taillights, flashers, etc.).
3. Check that all emergency equipment is present and intact/functional (i.e. spare tire, tools, camera, back up alarm etc.).
4. Note any and all prior damage done to exterior and interior of vehicle.
5. Check under vehicle for any leaking fluids.
6. Record vehicle mileage at beginning and end of each use.
  
7. Complete all vehicle forms as necessary.
8. Once the on-coming driver accepts the vehicle he/she then becomes responsible for any and all damages and/or missing items. Make sure the Vehicle Inspection Checklist is completed correctly.

**NOTE:** Allied Universal personnel are not to inspect vehicle fluid levels. Fluid levels will be checked and addressed during services appointments or at scheduled intervals by the Supervisor after the engine has cooled, so as to not pose a burn hazard.

Each driver will check the appearance and the condition of the vehicle before starting patrol. Any unsatisfactory reports will be brought to the attention of the Account Manager/Supervisor.

All vehicles will be maintained in a "CLEAN" state without exception.

1. Any officers operating a client or Allied Universal Allied Universal vehicle will ensure that the interior of the vehicle is cleaned out prior to the shift change, and ensure all windows are clean.
2. No Smoking or eating in the vehicle.
3. All trash and debris will be properly disposed.
4. ALL security equipment and supplies will be properly stowed at all times.
5. Each vehicle will be washed in accordance with Allied Universal and the clients requirements.

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### VEHICLE OPERATION RULES & REGULATIONS

**Vehicle Operation** - During the operation of a vehicle these specific policies are required of all drivers. No driver will operate a vehicle on company business while under the influence of alcohol or drugs, or while using prescription medication(s) that would impair their ability to drive safely. Drivers are prohibited from using electronic/communication devices while operating a vehicle (see Appendix 15.2).

**Unsafe Vehicles** - Never drive a vehicle you feel is unsafe or fails to meet the Vehicle Inspection Report requirements. Report it to your Supervisor immediately.

**Drive Defensively** - Obey traffic laws, expand your look-ahead capability, plan an escape route, and signal your intentions early.

**Rules of the Road** - Follow all "Rules of the Road" and any site specific requirements, if applicable. Observe all City/State Motor Vehicle Code Regulations.

**Speed Limit** - All vehicles are to be driven at speeds no greater than the posted speed limits, conditions permitting.

**Escorts** - Will only be carried out as outlined in the SITE OPM.

**Passengers** - Will be allowed in the vehicle(s) for "Official Business" only! (Escorts, repairs, etc.) Again, do not carry passengers unless authorized to do so by the Shift Supervisor or as directed by written policy.

**Usage Limit** - Vehicles will only be used in compliance with policies outlined in the OPM unless authorized by the client and/or account manager.

**Emergency Equipment** - Use is restricted to bona fide emergency situations only, unless otherwise directed.

**Chase/Pursuit** - The Allied Universal Allied Universal and client vehicle(s) are never to be involved in a high-speed chase or used in a pursuit.

**Vehicle Log** - Daily Vehicle Trip logs will be used to record all off-site trips.

**Accidents** - All accidents must be reported immediately to your supervisor and manager. Follow the Emergency Contact list guidelines in the OPM.

**Cleanliness** - Vehicles will be kept clean at all times.

**Cargo** - Will, whenever practical, be stored in the trunk, truck bed or rearmost space of the vehicle. Loads should be secured when possible and shall not exceed the manufacturer's weight limits.

**Locations** - Drivers must report their whereabouts each time they depart the SITE, if so authorized.



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**Incidents** - Drivers must report all observed or reported incidents and complete the appropriate incident report.

**Monitoring** - Supervisors must monitor all activity of security vehicles, as well as location, vicinity, and status of vehicle and driver. This can be accomplished by radio, direct visual site or CCTV whenever possible to confirm whereabouts and activity.

**Unattended Vehicle** - Whenever a vehicle is left unattended, the keys must be removed and it must be locked.

**Smoking** - Is not permitted inside any company/client vehicle at any time.

**Wear & Tear** - Officers must exercise care to prevent excessive wear and tear on vehicles.

**Emergency Vehicle Assistance** - Can be provided to any visitor, vendor, patron or employee if authorized by the Client for the site, provided the requesting party completes a waiver of liability. (Vehicle Emergency Assistance Request & Agreement). Such assistance will be provided in a prompt and courteous manner.

### **ACCIDENT REPORTING / INVESTIGATION PROCESS**

See Tab Five of the Safety Manual, "Incident Reporting & Investigation", for details on Accident Reporting and Investigations.

Vehicle accidents are dangerous, costly and very often preventable. Common causes of vehicle accidents include:

- Operating the vehicle at an unsafe speed
- Driver inattention or drowsiness
- Unsafe backing or parking
- Distracted driving
- Weather conditions
- Violating stop signals, signs, and/or paved markings
- Failure to apply defensive driving practices

#### **When to Report a Vehicle Accident:**

Employees must immediately notify their supervisor of any accident involving a company owned, company leased, or personally owned vehicle which occurs while conducting Allied Universal business.

When a vehicle accident involves a personally owned vehicle, the owner should report the incident and damage to the automotive insurance provider.

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### How to Report a Vehicle Accident:

1. The driver will notify their Supervisor of any vehicle accident, involving any motor vehicle, immediately.
2. The Supervisor or Manager will report any/all vehicle accidents involving a company owned or leased vehicle to the vehicle vendor within 48 hours of the incident.
3. The Supervisor or Manager will report any/all vehicle accidents involving any company owned or leased vehicle to the worker's compensation reporting vendor within 48 hours of the incident, regardless of injury.

### How to Investigate a Vehicle Accident:

Supervisors or Managers will investigate all vehicle accidents which result in property damage, injury, or which had the potential to do so. The depth and detail of the investigation will be dependent upon the severity or potential severity of the accident.

The incident investigation process outlined in the Incident Reporting & Response (Tab 5) section of the safety manual shall be referenced for all types of incident investigations, including vehicle accidents.

Client-specific forms and procedures, which are equivalent to or more detailed than the Allied Universal investigation process may be used to document in investigation and findings.

Allied Universal personnel will provide requested information to police officers in the event that an outside agency is involved in a motor vehicle investigation.

### DISCIPLINARY ACTION

Complete details of the Rules of Conduct for Drivers can be found in the company Operation of Vehicles Policy. However, it is helpful to reiterate that violation of one of the following will result in the suspension of a security officer's privilege to operate a site vehicle and may result in termination. The driver also may be held liable for damages.

- Driving under the influence of drugs or alcohol.
- Consumption of alcoholic beverage, a controlled substance, or use of medication (prescription or over-the-counter) that may lead to drowsiness or the inability to safely operate machinery, during or prior to operating an Allied Universal Allied Universal or client vehicle.
- Transporting liquor and/or drugs.
- Having a "Preventable" accident.
- Receiving a traffic citation while driving on Allied Universal Allied Universal business.
- Transportation of "UNAUTHORIZED" personnel.
- Reckless driving.
- Sleeping in a vehicle.
- Parking out of public view (unless authorized for a special detail).
- Driving without a valid license.

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- Driving without earning driving privileges (successfully completing all elements of section II of this policy).
- Vehicle Inspection Checklist not completed before operating vehicle.
- Failure to report an accident and/or vehicle damage.

# Vehicle Safety

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### QUARTERLY DRIVER'S LICENSE CHECK FORM - APPENDIX 15.1

\_\_\_\_\_ Q1 Q2 Q3 Q4  
 (Year) (Circle quarter)

Site: \_\_\_\_\_

Job Number(s): \_\_\_\_\_

Per the Allied Universal Vehicle Safety policy (Tab 15 of the Safety Manual) the driver's license of all employees who operate vehicles on behalf of Allied Universal will be checked initially upon assignment to a driving job and quarterly thereafter. It is the responsibility of the Account Manager/Security Director or their designee to complete and document these checks quarterly.

Drivers' Name	License #	Photocopy of current license attached	Date Completed
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
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\_\_\_\_\_  
 Name Signature Date

# Vehicle Safety

## Tab 15

### Mobile Device Use Policy for Drivers

#### Appendix 15.2

Policy regarding use of cellular phones, personal digital assistants (PDAs), converged devices, texting devices, computers, and other mobile electronic devices.

Our company is committed to providing a safe work environment for all our employees. In addition, we strive to prevent injury to third parties while our employees are performing work-related activities.

Using cellular phones, computers, messaging devices, or any other mobile electronic device while operating a motor vehicle is a critical safety concern for Allied Universal. As research has shown, such devices significantly distract drivers.

Distracted driving increases the likelihood that a crash will occur.

This policy is intended to control the circumstances under which an employee can utilize a cell phone or other remote device while operating a motor vehicle on company business, regardless of whether the vehicle is company-owned, rented/leased, or employee-owned.

Allied Universal requires all drivers on company business and drivers operating a company-owned vehicle for personal use to adhere to the following policy parameters while operating the motor vehicle:

- Employees must comply with federal, state, or local laws and regulations that may exist to control usage of mobile devices while operating a motor vehicle.
- If it is necessary to place or accept a cellular phone call at any time while operating a motor vehicle, the employee will safely drive his or her vehicle to an off road location where the vehicle can be stopped without risk to the employee or any third party.
- Drivers will not send, compose, or review received text messages, either on a company-owned or personally-owned device.
- Drivers will not operate any other mobile device, including but not limited to a Personal Digital Assistant (PDA), converged device, pocket PC, binaural headset-based audio device, such as an MP3 player, or laptop computer, either in a company owned or personally owned vehicle while on company business.
- Navigation systems will be programmed before the trip is started, not while the motor vehicle is in operation.

Any employee who fails to adhere to this policy may be subject to disciplinary action, including, for example, written warning and/or subsequent restrictions on using a vehicle for company business. Employee safety is a priority at Allied Universal, and your adherence to these guidelines will help us maintain the personal safety of our employees as well as that of our fellow drivers on the road.

#### Driver Receipt

I hereby acknowledge receipt of the **Mobile Device Use Policy for Drivers**. I agree to abide by the directives set forth in this policy and to conduct myself according to the standards established therein.

\_\_\_\_\_  
*Signature*

\_\_\_\_\_  
*Printed Name*

\_\_\_\_\_  
*Date*

To be kept in employee file.

# Specialized Patrol Vehicles

## Tab 16

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### **PURPOSE**

To further proper and safe operation of specialized patrol vehicles and prevent personal injury or property damage by Allied Universal employees.

### **SCOPE OF EMPLOYEES COVERED**

This applies to all operating sites and employees of Allied Universal Security who utilize any type of specialized patrol vehicle as part of their work duties. Elements described in this document will be implemented by the Branch Managers.

### **REFERENCES**

OSHA PPE Regulation, CPSC Bicycle Helmet Standard and Manufacturer's guidelines/ materials for each type of vehicle

### **POLICY STATEMENT**

Allied Universal Security employees and managers will only operate specialized patrol vehicles in accordance with the manufacturers' recommendations and the requirements outlined in this policy. Employees who will operate specialized patrol vehicles must complete training and demonstrate sufficient knowledge and skill, prior to operating any/each type of vehicle. An ANSI/ASTM-approved helmet must be worn by those operating a bicycle, Segway, T-3 or similar vehicle at all times. Where present, drivers and passengers of golf carts will utilize a seat belt.

### **A. KEY DEFINITIONS**

Specialized Patrol Vehicles (SPV) - Unregistered vehicles used to perform patrols and other work duties. Specialized Patrol Vehicles include, but are not limited to, bicycles, golf carts, Segway Personal Transporters, and three-wheeled powered patrol vehicles.

Personal Protective Equipment (PPE) - Specialized clothing or equipment worn by employees for protection against recognized health and safety hazards. Personal protective equipment items are designed to protect many parts of the body, i.e., eyes, head, face, hands, feet, and ears.

### **B. GENERAL REQUIREMENTS**

Requirements listed in section B apply to all Supervisors/ Managers and employees where SPVs are operated/ driven. Additional vehicle-specific requirements are listed in sections C-E of this policy:

Section C: Bicycles

Section D: Golf Cart

Section E: Segway/ T-3

# Specialized Patrol Vehicles

## Tab 16

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### Supervisors and/or managers of sites where SPVs are used by employees will:

- Complete vehicle-specific training and demonstrate sufficient knowledge and skill for each type of SPV used at their site to effectively supervise the inspection and operation of the equipment.
- Provide vehicle-specific training to each employee assigned to operate a SPV, so that all users demonstrate sufficient knowledge and skill to operate the vehicle safely and in accordance with this policy prior to operating each type of vehicle. A separate training course and evaluation form is required for each type of vehicle. Refresher training or operator evaluation may be necessary following a safety incident involving a SPV.
- Provide refresher vehicle-specific training annually or as needed following a near miss, incident, or when an employee is observed to operate a SPV in an unsafe manner.
- Provide required PPE to employees, and ensure that an adequate supply of replacement PPE is available on site. PPE required for each SPV type is listed below by vehicle type.
- Periodically observe SPV operators to assess compliance with established policy and/or procedure(s).
- Give timely corrective feedback and coaching to operators who are observed to operate a SPV in an unsafe manner or who are not in compliance with the policy and/or procedure(s).
- Take reasonable measures to verify that a pre-use safety inspection is completed by employees each shift before operating the SPV.
- Maintain on site the manufacturer's manual for each SPV, in a location and manner that employees have access to the documents.
- Direct that maintenance and repairs are made in accordance with the manufacturer's guidelines. Documentation of all such service will be maintained at the site and will identify the specific piece of equipment, the service provided, the date, and name of employee completing the service.
- Provide SPVs and equipment in good working order, and temporarily discontinue use of unsafe equipment until maintenance/ repairs are completed. Direct that each SPV is equipped with a headlight and rear light for dusk-to-dawn operations.
- Identify the areas where SPVs should and should not be driven on site. These expectations will be communicated to all SPV operators/drivers during training.
- Evaluate surface conditions to determine if the environment/weather is safe operating the SPV. When conditions will become unsafe, determine with the client if alternate means of patrol/transportation may be used.
- Contact the local HR Representative if notified by an employee of a medical or physical condition which may limit their ability to operate/drive the SPV in a safe manner.

During the first two weeks of assignment to operate a SPV, the Supervisor will observe the new operator during this probationary period to evaluate the operators' skill and compliance with procedure. If a new operator displays a lack of competence during this probationary period, the Supervisor may remove the employee from that task and reassign to a different post.

# Specialized Patrol Vehicles

## Tab 16

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### Employees who operate any SPV as part of their duties will:

- Wear appropriate attire and PPE, as detailed below by vehicle type. Employees operating a SPV outdoors will wear reflective apparel, such as a high visibility vest, at all times.
- Review the manufacturer's manual for the SPV model(s) which they will operate/drive.
- Inspect the SPV and equipment before use each shift as detailed in vehicle-specific requirements (sections C-E of this policy).
- Operate the SPV using the following safe practices, in accordance with practices taught in training and post orders. Operators will not use communications, electronic, or other devices while the vehicle is in motion.
- Notify their Supervisor of any medication(s) or physical condition(s) which could limit their ability to operate/drive the SPV in a safe manner.

### C. BICYCLE-SPECIFIC REQUIREMENTS

Bicycles will be operated in accordance with the manufacturers guidelines for maintenance, tire

pressure, weight capacity, environment, etc. Bicycles will be used by the operator only; multiple riders are prohibited. All bicycles will be equipped with reflective material on the wheels; additional reflective material(s) on the bicycle and rider's apparel is encouraged. Bicycles operated outdoors between dusk and dawn will be equipped with a headlight lamp and rear light.

In addition to the General Requirements of section B, **Supervisors and/or Managers of sites where bicycles are operated by employees will:**

- Document that trained bicycle operators can demonstrate sufficient knowledge and skill to operate a bicycle safely and in accordance with this policy using the attached Appendix 16.1: Bicycle Skills Check list or an equivalent form.
- Provide PPE to employees; ensure an adequate supply of replacement PPE is available on site. Required PPE:
  - A bicycle helmet approved by American National Standards Institute (ANSI) or Snell Memorial Foundation
  - Reflective apparel, such as a high-visibility vest, for dusk-to-dawn riding
  - Clips or bands to secure long pants at the ankle
  - Thermal gloves for cold weather, appropriate for use while operating a bicycle
- Where applicable, provide training to employees who may be expected to perform minor bicycle re pairs, such as emergency tire repairs, etc.
- Ensure that a headlight (minimum 50 foot light stream) and red rear light are utilized by each cyclist for dusk-to-dawn rides.
- Check equipment such as saddlebags, and other devices on the bicycle intended to carry equipment, to verify that it is secure and does not create an obstruction to operating the bicycle.



# Specialized Patrol Vehicles

## Tab 16

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### Employees who operate a bicycle as part of their duties will:

- Wear appropriate attire, such as:
  - A properly secured and positioned ANSI or Snell-approved helmet
  - Multiple layers of clothing during cold weather
  - Cycling and/or thermal gloves
  - Secure long pants and shoe laces to prevent contact with bicycle chain/ gears
  - Wear clothing free of design/ parts which are likely become entangled in the bicycles' moving parts
  - Closed-toe, secure shoes or boots which meet uniform requirements
  
- Inspect the bicycle for the following items before use each shift:
  - Proper tire pressure and adequate tire tread
  - Seat and handle-bars are adjusted to proper height and fully secured
  - Chain is lubricated and all other parts of bike free of oil
  - Test the brakes for smooth, quick response
  - Check pedals to ensure they spin freely
  - Reflectors are in-tact/visible: front tire, rear tire, pedals, front of handlebars, rear of seat
  - Before starting a dusk-to-dawn shift check the proper operations of an illuminated rear light and headlight (50 foot light stream required) NOTE: Appendix 16.2: Bicycle Safety Inspection, or a site-specific equivalent form, will be used to document pre-use inspections
  
- Operate the bicycle using the following safe practices, in accordance with practices taught in training and post orders:
  - Obey all traffic signals, signs, and pavement markings
  - Give pedestrians the right of way
  - Stop before entering a roadway from a sidewalk or driveway
  - Ride on the right side of the road, close to the edge. If in a group, ride single file at least one bike length apart
  - Avoid potholes, bumps, stairs/ curbs, ice, oil slicks, loose gravel, sand, and sewer grates
  - Apply even pressure to both brakes (front and rear) at the same time
  - Be alert and observe pedestrian and vehicle activity near walkway and parking areas – ride at a speed to anticipate a moving obstacle and safely react
  - Keep both hands on the handlebars while moving
  - Ride only in authorized areas – never operate the bicycle on sidewalks, highways, or streets where not permitted

Bicycle Operator Training will include, at a minimum, the following elements:

- Instruction on the safe operating practices and PPE requirements.
- Review of the manufacturer's manual and safe operating guidelines.
- Review of the locations where the bicycle should and should not be operated on site.

# Specialized Patrol Vehicles

## Tab 16

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- Trainee will demonstrate adequate skill in operating the bicycle in the environment in which it will be used.
- Trainee will demonstrate the ability to complete the bicycle pre-use inspection.
- Review of the maintenance and repair procedures from the bicycle manufacturer.

Bicycle operators will complete training when:

- They are newly assigned to a position to operate a bicycle
- There is a change in equipment or procedure
- They are observed to fail to follow procedure, demonstrate insufficient skill to operate the bicycle safely or have been involved in an accident while operating a bicycle in the workplace.

### **D. GOLF CART-SPECIFIC REQUIREMENTS**

Golf Carts will be driven in accordance with the manufacturers guidelines for maintenance, tire pressure, weight capacity, environment, etc. Certified golf cart drivers will drive only on authorized paths/areas, choosing the safest path and avoiding narrow clearances. Golf Carts will be equipped with headlights, tail lights, and the driver will wear reflective apparel during dusk-to-dawn driving; additional reflective material on the sides of the vehicle is encouraged.

In addition to the General Requirements of section B, Supervisors and/or Managers of sites where Golf Carts are driven by employees will:

- Document that trained Golf Cart drivers can demonstrate sufficient knowledge and skill to operate a Golf Cart safely and in accordance with this policy using the attached Appendix 16.3: Golf Cart Driving Skills Checklist.
- Closely monitor new drivers for a two-week probationary period following completion of Golf Cart Driver training. Ride with and observe the new driver frequently during this time period.
- Direct that drivers and passengers wear their seatbelt(s), where available, when the vehicle is in motion.
- Inspect periodically each golf cart and the cart inspection records to verify compliance with this policy and manufacturer's guidelines.
- Maintain all vehicle-specific maintenance logs for the life of the unit.
- Provide safety equipment including, but not limited to, back-up alarms and flashing yellow lights on all golf carts which will be operated in areas that are noisy, dark, and/or has blind corners (i.e. indoor parking areas).
- Provide any additional PPE called for by the manufacturer's guidelines for battery maintenance tasks.

Employees who drive a golf cart as part of their duties will wear appropriate attire, such as:

- Multiple layers during cold weather
- Weather-protective gear as needed, such as hats, gloves, rain gear, etc.
- Closed-toe, secure shoes or boots which meet uniform requirements

# Specialized Patrol Vehicles

## Tab 16

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Inspect the golf cart for the following items before use each shift: Complete the site Golf Cart Safety Inspection Checklist (Appendix 16.4), or an equivalent form, before use and provide documentation to the Supervisor/ Manager. One completed checklist is required for each vehicle on each day that the vehicle is operated.

Wear protective gloves and safety glasses, and follow the manufacturer's guidelines for battery maintenance and refueling.

Drive the golf cart using the following safe practices, in accordance with practices taught in training and post orders, following client-specific guidelines regarding golf cart passengers:

- The driver and passengers will fasten their seatbelt, where present, before the golf cart is driven.
- Provide verbal warning to passengers, before the golf cart moves, regarding where to hold on.
- Receive verbal clearance from all passengers before proceeding.
- Keep their entire body within the passenger area of the golf cart (no extended hands or dangling feet) while moving.
- Keep both hands on the steering wheel at all times while moving.
- Obey all traffic signals, signs, and pavement markings.
- Give pedestrians the right of way; maintain a distance from pedestrians to allow time to stop the vehicle.
- Stop before entering a roadway from a sidewalk or driveway.
- Drive on the right side of the road.
- Avoid potholes, bumps, stairs/ curbs, ice, oil slicks, loose gravel, sand, and railroad tracks.
- Be alert and observe pedestrian and vehicle activity near walkway and parking areas. Maintain distance between the golf cart and other fixed or moving obstacles. Drive at a speed to anticipate a moving obstacle and safely react.
- Drive only on authorized paths/areas. Drivers will not attempt to drive the golf cart between two closely positioned fixed objects (no tight squeezes).
- Affix the parking brake and remove the vehicle keys before leaving the vehicle.
- Specifically follow the guidelines of the golf cart manufacturer regarding battery maintenance, including use of PPE.

Golf Cart Driver Training will include, at a minimum, the following elements:

- Instruction on the safe operating practices and PPE requirements.
- Review of the manufacturer's manual and safe operating guidelines.
- Review of the locations where the golf cart should and should not be operated on site, including a tour of the site to identify any hazardous locations (slopes, traffic, etc.)
- Review of the refueling and recharging specifications from the cart manufacturer.
- Review of the maintenance and repair procedures from the cart manufacturer.
- Ride-along to observe an experienced cart driver trainer.
- Trainee will demonstrate adequate skill in driving the golf cart in the environment in which it will be used.

# Specialized Patrol Vehicles

## Tab 16

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- Trainee will demonstrate the ability to complete the attached Golf Cart Inspection Checklist.

Golf Cart Drivers will complete training when:

- They are newly assigned to a position to drive a golf cart
- There is a change in equipment or procedure
- They are observed to fail to follow procedure, demonstrate insufficient skill to drive the golf cart safely or have been involved in an accident while driving a golf cart in the workplace.

### **E. SEGWAY, T-3, AND SIMILAR VEHICLES - SPECIFIC REQUIREMENTS**

Segways, T-3, and similar vehicles will be operated in accordance with the manufacturers' guidelines in the Equipment Reference Manual. Segways, T-3s, and similar vehicles will be used by the operator only; passengers are prohibited. These SPVs operated outdoors between dusk and dawn will be equipped with a headlight lamp, rear light, and reflective material on the vehicle body or handle bar.

In addition to the General Requirements of section B, Supervisors and/or Managers of sites where Segways, T-3s, and similar vehicles are driven by employees will:

- Document that trained drivers can demonstrate sufficient knowledge and skill to operate the vehicle safely and in accordance with this policy using the attached Segway/Three-wheeled Unit Driving Skills Checklist (Appendix 16.5), or an equivalent form.
- Closely monitor new drivers for a two-week probationary period following completion of Segway/T-3 Driver training. Observe the new driver frequently during this time period.
- Inspect bi-weekly each vehicle and the vehicle inspection records to ensure compliance with this policy and manufacturer's guidelines.
- Maintain all vehicle-specific maintenance logs for the life of the unit.
- Ensure that total payload are within the manufacturer's weight limits:
  - Segway vehicles: Maximum total weight of 260 pounds, consisting of up to 10 pounds of weight on the handlebars and a driver weighing between 100-250 pounds. No one weighing less than 100 pounds or more than 250 pounds is permitted to operate a Segway.
  - T-3 vehicles: Maximum total weight of 450 pounds including the driver and all additional cargo.
- Maintain the speed limiter to a maximum of 8 mph, or contract-specific limit if different.
- Provide PPE to employees; ensure an adequate supply of replacement PPE is available on site. Required PPE:
  - A bicycle helmet approved by American National Standards Institute (ANSI) or Snell Memorial Foundation
  - Thermal gloves for cold weather
  - Safety glasses for outdoor driving
  - Protective elbow pads
- Ensure that a headlight (minimum 50 foot light stream) and red rear light are utilized on each Segway, T-3, or similar vehicle for outdoor dusk-to-dawn operation.

# Specialized Patrol Vehicles

## Tab 16

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Employees who drive a Segway, T-3, or similar vehicle as part of their duties will:

- Wear appropriate PPE and attire, such as:
  - An ANSI or Snell-approved helmet
  - Closed-toe, secure shoes or boots which meet uniform requirements
  - High visibility apparel with reflective material for outdoor driving
  - Multiple layers during cold weather
  - Weather-protective gear as needed, such as hats, gloves, sunglasses, etc.
  
- Inspect the vehicle for the following items before use each shift:
  - Complete the Segway/ Three-wheeled Vehicle Inspection Checklist (Appendix 16.6), or an equivalent form, before use and provide documentation to the Supervisor/ Manager. One completed checklist is required for each vehicle on each day that the vehicle is operated.
  
- Only drive the Segway or T-3 with appropriate driver and cargo weights:
  - Segway – total weight capacity of 100-260 pounds; drivers may only weight 100-250 pounds.
  - T-3 – total weight capacity of 450 pounds.
  
- Drive the Segway, T-3, or similar vehicle using the following safe practices, in accordance with practices taught in training and post orders:
  - Maintain both feet securely placed on the mats and at least one hand (preferably two) on the handlebars at all times. The driver will stop the vehicle if both hands must be removed from the handlebars.
  - Stop the vehicle before using electronic communication devices.
  - Wherever possible maintain at least 5 feet of distance between the vehicle wheels and significant changes in elevation (i.e.  $\geq 1$  foot drop to lower level).
  - Obey all traffic signals, signs, and pavement markings.
  - Give pedestrians the right of way; maintain a distance from pedestrians to allow time to stop the vehicle.
  - Stop before entering a roadway from a sidewalk or driveway.
  - Drive on the right side of the road.
  - Avoid potholes, bumps, stairs/ curbs, ice, oil slicks, loose gravel, sand, and railroad tracks.
  - Be alert and observe pedestrian and vehicle activity near walkway and parking areas. Maintain distance between the vehicle and other fixed or moving obstacles. Drive at a speed to anticipate a moving obstacle and safely react.

NOTE: Where Segway units are operated inside shopping centers, drivers must caution near any elevation changes. Wherever possible drivers will operate the vehicle five feet or more from floor openings, including stairways.

# Specialized Patrol Vehicles

## Tab 16

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Segway/T-3/ similar vehicle Driver Training will include, at a minimum, the following elements:

- Instruction on the safe operating practices and PPE requirements.
- Review of the manufacturer's manual and safe operating guidelines.
- Review of the locations where the vehicle should and should not be operated on site, including a tour of the site to identify any hazardous locations (slopes, traffic, etc.)
- Review of the recharging specifications from the manufacturer.
- Review of the maintenance and repair procedures from the vehicle manufacturer.
- Observation of an experienced vehicle driver trainer.
- Trainee will demonstrate adequate skill in driving the vehicle in the environment in which it will be used.
- Trainee will demonstrate the ability to complete the attached Segway/T-3 Inspection Checklist.

Segway/T-3/ similar vehicle Drivers will complete training when:

- They are newly assigned to a position to drive a Segway/T-3/ similar vehicle.
- There is a change in equipment or procedure
- They are observed to fail to follow procedure, demonstrate insufficient skill to drive the vehicle safely or have been involved in an accident while driving the vehicle in the workplace.

# Specialized Patrol Vehicles

## Tab 16

### BICYCLE SKILLS CHECKLIST - APPENDIX 16.1

\* A site-specific document or this example form may be used to meet the requirement for pre-use inspection.

Trainee Name:

Employee Number:  Today's Date:  -  -

Manager's Name

Pass	Fail	N/A	<b>VEHICLE AWARENESS: Driver has completed the following training:</b>
			Review of the Specialized Patrol Vehicles policy
			Review of vehicle-specific procedures for safe operation and accident reporting
			Watch the training video and/or demonstration
			Hands-on skills practice

Pass	Fail	N/A	<b>VEHICLE INSPECTION: Driver knows what/how to look for:</b>
			Check vehicle body for damage: chips, cracks, dents
			Check operability of lights, horn and siren
			Check tires for proper inflation or damage
			Check handlebars for stability and grip
			Check brakes for operability

Pass	Fail	N/A	<b>VEHICLE OPERATION: Driver has demonstrated the knowledge and skill to:</b>
			Properly wear the helmet and personal protective equipment
			Safely mount and dismount the bicycle
			Safely steer, brake, and maintain speed control (include inclement weather situations)
			Successfully complete the driving course (box, short, figure 8, extended figure 8)
			Stop the bicycle in a safe and controlled manner (stop sign, cross walk, emergency)
			Understand and apply safety rules for driving among traffic and pedestrians
			Appropriately use the safety lights, hand signals and horn
			With the Instructor as a witness the new driver will travel the actual patrol route. The driver will safely negotiate the patrol route and return the vehicle to the starting point.

Instructor's Name

Instructor's Signature: \_\_\_\_\_

Trainee's Signature: \_\_\_\_\_

# Specialized Patrol Vehicles

## Tab 16

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### BICYCLE SAFETY INSPECTION CHECKLIST - APPENDIX 16.2

\* A site-specific document or this example form may be used to meet the requirement for pre-use inspection.

Date: \_\_\_\_\_ Shift: \_\_\_\_\_

Driver: \_\_\_\_\_

Unit ID: \_\_\_\_\_

#### Equipment Checks:

Brake function: \_\_\_\_\_ Tire pressure: front \_\_\_\_\_ rear \_\_\_\_\_

Lights: Headlamp: \_\_\_\_\_ Tail Lamp: \_\_\_\_\_

Reflectors: Front \_\_\_\_\_ Rear \_\_\_\_\_ Pedals \_\_\_\_\_ Wheel (x2) \_\_\_\_\_

Are the hand grips tight? \_\_\_\_\_. Do the shifters work smoothly? \_\_\_\_\_

Is the unit clean and free of damage? \_\_\_\_\_

#### Saddlebag equipment:

Site Map: \_\_\_\_\_ Flashlight: \_\_\_\_\_ Policy: \_\_\_\_\_

Spare Tube: \_\_\_\_\_ Pump: \_\_\_\_\_ Tire Levers: \_\_\_\_\_

This vehicle is for use on the client site only. The vehicle is not for personal use. All damage, malfunction or missing equipment will be reported prior to use and during use. All applicable vehicle laws and ordinances, and policies and procedures will be followed during use.

Driver's Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Supervisor's Signature: \_\_\_\_\_ Date \_\_\_\_\_



# Specialized Patrol Vehicles

## Tab 16

### GOLF CART DRIVING SKILLS CHECKLIST - APPENDIX 16.3

\* A site-specific document or this example form may be used to meet the requirement for pre-use inspection.

Trainee Name:

Employee Number:  Today's Date:  -  -

Manager's Name

Pass	Fail	N/A	<b>VEHICLE AWARENESS: Driver has completed the following training:</b>
			Review of the Specialized Patrol Vehicles policy
			Review of vehicle-specific procedures for safe operation and accident reporting
			Watch the training video and/or demonstration
			Hands-on skills practice

Pass	Fail	N/A	<b>VEHICLE INSPECTION: Driver knows what/how to look for:</b>
			Check vehicle body for damage: chips, cracks, dents
			Check operability of lights, horn and siren
			Check tires for proper inflation or damage
			Check handlebars and steering column for stability and grip
			Verify battery level(s) is at full charge

Pass	Fail	N/A	<b>VEHICLE OPERATION: Driver has demonstrated the knowledge and skill to:</b>
			Start the vehicle using the proper key/procedure
			Verify proper guage readings
			Safely steer, brake, and maintain speed control (include inclement weather situations)
			Successfully complete the driving course
			Stop the vehicle in a safe and controlled manner (stop sign, cross walk, emergency)
			Safely shut down and park the vehicle
			Appropriately use the safety lights, siren and horn
			With the Instructor as a witness the new driver will travel the actual patrol route. The driver will safely negotiate the patrol route and return the vehicle to the starting point.

Instructor's Name

Instructor's Signature: \_\_\_\_\_

Trainee's Signature: \_\_\_\_\_

# Specialized Patrol Vehicles

## Tab 16

### GOLF CART SAFETY INSPECTION CHECKLIST - APPENDIX 16.4

\* A site-specific document or this example form may be used to meet the requirement for pre-use inspection.

Date: \_\_\_\_\_ Shift: \_\_\_\_\_

Driver: \_\_\_\_\_ Unit ID: \_\_\_\_\_

#### Equipment Checks:

1	Cleanliness	Good / Fair / Poor	At start of shift
2	Tires (Inflation/ tread)	Good / Fair / Poor	
3	Seat Bench	Good / Fair / Poor	
4	Suspension	Good / Fair / Poor	
5	Headlights	Good / Fair / Poor	
6	Taillights	Good / Fair / Poor	
7	Batteries	Full / Add water	
8	Brake Lights	Good / Fair / Poor	
9	Wash Cart	Yes ____ / No ____	
10	Oil	Full / Low / Added ____	At end of shift
11	Gas	Full / Added ____	
12	Windshield	Good / Fair / Bad	
13	Trash in Cart	Yes ____ / No ____	
14	Body Damage		
15	Other Damage		

This vehicle is for use on the client site only. The vehicle is not for personal use. All damage, malfunction or missing equipment will be reported prior to use and during use. All applicable vehicle laws and ordinances, and policies and procedures will be followed during use.

Explain Any Damage:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Driver's Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Supervisor's Signature: \_\_\_\_\_ Date \_\_\_\_\_

# Specialized Patrol Vehicles

## Tab 16

### SEGWAY/THREE-WHEELED UNIT DRIVING SKILLS CHECKLIST - APPENDIX 16.5

\* A site-specific document or this example form may be used to meet the requirement for pre-use inspection.

Trainee Name:

Employee Number:  Today's Date:  -  -

Manager's Name

Pass	Fail	N/A	<b>VEHICLE AWARENESS: Driver has completed the following training:</b>
			Review of the Specialized Patrol Vehicles policy
			Review of vehicle-specific procedures for safe operation and accident reporting
			Watch the training video
			Hands-on skills practice

Pass	Fail	N/A	<b>VEHICLE INSPECTION: Driver knows what/how to look for:</b>
			Check vehicle body for damage: chips, cracks, dents
			Check operability of lights, horn and siren
			Check tires for proper inflation or damage
			Check handlebars and steering column for stability and grip
			Verify battery level(s) is at full charge

Pass	Fail	N/A	<b>VEHICLE OPERATION: Driver has demonstrated the knowledge and skill to:</b>
			Start the vehicle using the proper key/procedure
			Verify proper guage readings
			Properly wear the helmet and protective eye gear
			Safely mount and dismount the vehicle
			Safely steer, brake, and maintain speed control (include inclement weather situations)
			Successfully complete the driving course (box, short, figure 8, extended figure 8, elevator)
			Stop the vehicle in a safe and controlled manner (stop sign, cross walk, emergency)
			Safely shut down and park the vehicle
			Appropriately use the safety lights, siren and horn
			With the Instructor as a witness the new driver will travel the actual patrol route. The driver will safely negotiate the patrol route and return the vehicle to the starting point.

Instructor's Name

Instructor's Signature: \_\_\_\_\_

Trainee's Signature: \_\_\_\_\_

# Specialized Patrol Vehicles

## Tab 16

### SEGWAY/T-3 VEHICLE INSPECTION CHECKLIST - APPENDIX 16.6

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Date: \_\_\_\_\_

Shift: \_\_\_\_\_

Driver: \_\_\_\_\_

Unit ID: \_\_\_\_\_

#### Equipment Checks:

Brake function: \_\_\_\_\_ Horn: \_\_\_\_\_ Siren: \_\_\_\_\_

Tires: Free of Damage? \_\_\_\_\_ Check for proper inflation: front \_\_\_\_\_ Left/Right \_\_\_\_\_

Lights: Headlamp: \_\_\_\_\_ Tail Lamp: \_\_\_\_\_

Reflectors: Front \_\_\_\_\_ Rear \_\_\_\_\_

Are the hand grips tight? \_\_\_\_\_ Is steering column sturdy? \_\_\_\_\_

Is the unit clean and free of damage? \_\_\_\_\_

This vehicle is for use on the client site only. The vehicle is not for personal use. All damage, malfunction or missing equipment will be reported prior to use and during use. All applicable vehicle laws and ordinances, and policies and procedures will be followed during use.

Driver's Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Supervisor's Signature: \_\_\_\_\_ Date \_\_\_\_\_

# Access to Employee Medical & Exposure Records Policy

## Tab 17

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### PURPOSE

The purpose of this policy is to establish procedures to insure the right of access to relevant exposure and medical records by employees, their designated representatives, and/or OSHA Representatives.

### REFERENCES

Occupational Safety and Health Administration (OSHA) 29 CFR 1910.1020 and Cal-OSHA:  
**GENERAL INDUSTRY SAFETY ORDER 3204.**

### SCOPE

This policy applies to all Allied Universal entities. All employee exposure and medical records, and analyses thereof, will be maintained and made accessible as outlined in the Access Procedure and Record Retention sections of this policy.

### APPLICATION

All medical records and/or exposures records which document that employees are or were exposed to toxic substances and/or harmful physical agents must be maintained in compliance with OSHA Standard 29 CFR 1910.1020 and Cal-OSHA: **GENERAL INDUSTRY SAFETY ORDER 3204.**

This standard requires that these records be made available to employees, former employees, and any designated employee representative or an OSHA Compliance Officer in accordance with the following procedures.

**A.** Upon written request, an employee, former employee, designated representative and/or OSHA Compliance Officer has the right to examine and receive copies of medical records, exposure records, and any analysis based on these records. An employee may designate any individual or organization by means of a written authorization to exercise the right of access to such records. See Appendix 17.1 to this section: Authorization Letter for the Release of Employee Medical Records.

**B.** Recognized collective bargaining agents who have statutory authority to represent the interests of the employees within the bargaining unit are automatically considered designated representatives. While these representatives do not have the right to secure individual medical records without written consent of the employee, they have the right of access to employee exposure records and analysis without employee consent. However, union representatives must show an occupational health need when seeking access to employee exposure records for which the employee's written consent has not been given.

### DEFINITIONS

**A.** Access means the right and opportunity to examine and copy.

**B.** Analysis of exposure or medical records means any compilation of data, and research, or other studies based, at least in part, on information collected from individual employee exposure or medical records or other sources including information from health insurance claim forms provided that either the analysis must have been reported to the employer or no further work is being done by the person responsible for preparing the analysis.

# Access to Employee Medical & Exposure Records Policy

## Tab 17

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**C.** Designated representative will mean any individual or organization to whom an employee gives written authorization to exercise a right of access. For the purposes of access to employee exposure records and analyses using exposure or medical records, a recognized or certified collective bargaining agent shall be treated automatically as a designated representative without regard to written employee authorization.

**D.** An exposure record contains any of the following kinds of information concerning employee exposure to various substances or physical agents used in the workplace.

1. Workplace monitoring or measuring of a toxic substance or harmful physical agent including personal, area, grab, wipe, or other forms of sampling and includes related collection and analytical methods, calculations and other background data relevant to interpretation of results obtained.
2. Biological tests which directly assess absorption of a toxic substance or harmful physical agent into the body. A biological test which assesses the effect of the body would be a medical record.
3. A Safety Data Sheet indicating that the material may pose a hazard to human health.
4. Any other record which identifies a toxic substance or physical agent as potentially toxic or harmful and reveals where and when it was used.

**E.** A medical record is any record concerning the health status of an employee made or maintained by a doctor, nurse, or other health care professional or technician. This includes:

1. Medical and employment questionnaires or histories including past descriptions and occupational exposures.
2. The results of any medical exam (pre-employment, pre-assignment, periodic or episodic), and any laboratory tests (x-ray and all biological monitoring).
3. Medical opinions, diagnosis, progress notes and recommendations.
4. Description of treatments and prescriptions.
5. First aid records.
6. Employee medical complaints.

**The following will not be considered a medical record:**

1. Physical specimens, such as blood or urine samples, which are routinely discarded.
2. Health insurance claims, accident investigation reports and other non-medical correspondence if maintained separately from the medical file.
3. The record of any voluntary employee assistance program (alcohol, drug, etc.) if maintained separately.
4. Records created solely in preparation for litigation which are privileged from discovery under applicable rules of procedure or evidence.

# Access to Employee Medical & Exposure Records Policy

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**F.** Specific written consent may be provided through completion of Appendix 17.1 to this section: the Authorization Letter for the Release of Employee Medical Records. This written authorization contains the following:

1. The name and signature of the employee authorizing the release of medical information.
2. The date of the written authorization.
  
3. The name of the individual or organization that is authorized to release the medical information.
4. The name of the designated representative (individual or organization) that is authorized to receive the released information.
5. A general description of the medical information that is authorized to be released.
6. A general description of the purpose for release of the medical information.
7. A date or condition upon which the written authorization will expire (if less than one year).

**G.** A toxic substance or harmful physical agent is defined as any chemical substance, biological agent (bacteria, fungus, virus, etc.) or physical stress (noise, heat, cold, ionizing radiation or non-ionizing radiation, hypo or hyperbaric pressure, etc.) which:

1. Is regulated under federal law or rule due to a hazard to health.
2. Is listed in the National Institute of Occupational Safety and Health (NIOSH) Registry of Toxic Effects of Chemical Substances (RTECS).
3. Shows positive evidence of acute or chronic health hazard in human, animal or other biological test by or known to the employer.
4. Has a chemical Safety Data Sheet indicating that the substance may pose hazard to human health.

### ACCESS PROCEDURE

The regional Director of Human Resources is responsible to maintain applicable medical and exposure records for all employees. All requests to access medical and exposure records and analysis based on those records must be submitted to using the forms provided for that purpose.

**A.** The regional Director of Human Resources will assure access of each employee and/or their designated representative, to all exposure and medical records concerning the employee's work conditions or workplace within 15 working days from the day request is made. If the records cannot be provided within 15 working days, the employee or designated representative requesting the record shall be informed with the reason(s) for the delay and the earliest date when the record(s) can be made available.

**B.** Except for a recognized collective bargaining agent, any designated representative must have the employee's written permission for access to exposure records and analyses. It is necessary however, for the union representative to specify the occupational need for access to records absent the

# Access to Employee Medical & Exposure Records Policy

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employees' consent. Union representatives must have the employee's written permission to access medical records.

**C.** Employees or their representatives will be provided with one copy of the records at no cost. There will also be no charge for the first request for information by a recognized collective bargaining agent, even if the employee has previously received a copy of the same record. Each copy provided will be stamped with the word COPY. At no time will original records and/or x-rays be loaned out to enable the requesting party to make a copy

**D.** Any review of medical or exposure records by an employee or union representative shall be done on his or her own time, outside of normal working hours, at a time mutually agreeable to the parties. The review will be conducted in person with the individual requesting access to the records.

**E.** The employee is entitled access to his or her medical records except when a physician determines that this knowledge would be detrimental to the employee's health as in such cases of terminal illness or psychological conditions. However, if the employee provides a designated representative with specific written consent, access to medical records must be provided even if the physician has denied the employee access to the records. [Reference 1910.1020(e)(2)(ii)(c)(3) and Cal-OSHA: **GENERAL INDUSTRY SAFETY ORDER 3204.**]

**F.** The facility will provide an OSHA Compliance Officer with access to employee exposure and medical records within a reasonable time period of the request. In most cases, the Department of Commerce must provide a written access order which must be posted for 15 days before personally identifiable medical records are copied. A copy of the written access order will be provided to the union if applicable.

**G.** The authorized physician, nurse or other responsible health care personnel maintaining employees' medical records may delete the identity of anyone who has provided confidential information concerning the employee's health status but cannot withhold the information itself.

**H.** When an analysis of medical records identifies the employee, a physician may remove direct or indirect personal identification. If this cannot be done, the personally identifiable portions need not be provided to the person seeking such information.

**I.** Employees and their designated representatives will be permitted upon request access to past and present exposure data to toxic substances or harmful physical agents.

**J.** Copies of exposure records of other employees with past or present job duties or working conditions like or similar to those of the employee will also be provided upon request.

**K.** Any employee or designated representative is also permitted access to any record of exposure information which pertains to a new workplace or condition(s) to which the employee is being assigned or transferred.



# Access to Employee Medical & Exposure Records Policy

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**L.** Whenever access is granted to an analysis which reports the contents of employee medical records by either direct identifier (name, address, social security number, payroll number, etc.) or by information which could reasonably be used under the circumstances indirectly to identify specific employees (exact age, height, weight, date of initial employment, job title, etc.), Allied Universal Allied Universal will remove all such personal identifiers before access to such documents is granted.

**M.** Upon request Allied Universal Allied Universal will provide prompt access to employee medical and exposure records to OSHA Compliance Officers. Whenever OSHA seeks access to personally identifiable employee medical records by presenting a written access order, Allied Universal Allied Universal will post that written access order and its accompanying cover letter in the Read File and on a bulletin board in the work area of all affected employees for at least fifteen (15) days.**RECORD**

### RETENTION

**A.** Employee medical records, except first aid records of minor scratches, cuts, burns, etc. and separately maintained health and workers' compensation claim records, shall be maintained for at least the duration of employment plus 30 years.

**B.** Employee exposure records shall be preserved and maintained for at least 30 years, except that:

1. Background data to environmental (workplace) monitoring or measuring, such as laboratory reports and worksheets, need only be retained for one (1) year as long as the sampling results, the collection methodology, (sampling plan), a description analytical and mathematical methods used, and a summary of other background data relevant to interpretation of the results obtained are retained for at least thirty (30) years; and
2. Chemical Safety Data Sheets (SDS) and any other records concerning the identity of a substance or agent need not be retained for any specified period as long as some record of the identity (chemical name if known) of the toxic substance or harmful physical agent, where it was used, and when it was used is retained for at least thirty (30) years.
3. Any analysis of medical records or exposure records will be retained for thirty (30) years.
4. Only chest x-rays must be kept in the original form. All other records may be retained in any retrievable form.
5. Biological monitoring results designated as exposure records by specific occupational safety and health standard shall be preserved and maintained.

**C.** Arrangements will be made to maintain records according to the above time periods if Allied Universal Allied Universal were to cease operations or transfer ownership.

# Access to Employee Medical & Exposure Records Policy

## Tab 17

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### EMPLOYEE INFORMATION

**A.** Reference Appendix 17.2 to this section: 'Annual Employee Notice of Access to Medical/Exposure Records' for a copy of the employee notice that will be used to comply with the employee information requirements. This notice will be posted on bulletin boards and all Read Files where other notices normally appear.

**B.** Upon initial assignment, and annually thereafter, employees will be provided with the following information:

1. The existence of, location and availability of covered records.
2. The name of the individual maintaining and providing access to these records.
3. The right of every employee to access these records.

**C.** The Access to Employee Exposure and Medical Records Standard (29 CFR 1910.1020 and Cal-OSHA: **GENERAL INDUSTRY SAFETY ORDER 3204**) will be readily available for review by employees upon request.

# Access to Employee Medical & Exposure Records Policy

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### AUTHORIZATION LETTER FOR THE RELEASE OF EMPLOYEE MEDICAL RECORDS - APPENDIX 17.1

I, \_\_\_\_\_ hereby authorize the  
(Full name of employee)

\_\_\_\_\_  
(Name of Organization)

to release to \_\_\_\_\_  
(individual or organization authorized to receive the medical information)

the following medical record(s): \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
(give **specific** description of the information to be released)

I give my permission for the medical information to be used for the following purpose(s):

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

I do **not** give permission for any other use or reason.

I understand that this authorization expires twelve (12) months from today's date unless I specify a particular date less than twelve months, which is \_\_\_\_\_  
(other expiration date)

\_\_\_\_\_  
Signature of employee or  
his/her legal representative

\_\_\_\_\_  
Date of Signature

Reviewed on: \_\_\_\_\_ with: \_\_\_\_\_  
(Date) (Signature of Organization's Representative)

Copies given: Yes \_\_\_\_\_ No \_\_\_\_\_

# Access to Employee Medical & Exposure Records Policy

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### ANNUAL EMPLOYEE NOTICE OF ACCESS TO MEDICAL/EXPOSURE RECORDS - APPENDIX 17.2

The Federal Regulation 29 CFR 1910.1020 (Cal-OSHA: **GENERAL INDUSTRY SAFETY ORDER 3204**) requires me to inform you that Allied Universal Allied Universal does keep records designated as Employee Exposure and Employee Medical Records.

The above regulation gives you the right to review those records with certain exceptions.

A copy of 29 CFR 1910.1020 and Cal-OSHA safety order-3204 is available for viewing at the Occupational Safety and Health Administration website: [www.osha.gov](http://www.osha.gov) Contact me to request a paper copy of the standard, if needed. Within 10 days of the request I will included the printed standard in the Read File for review.

\_\_\_\_\_  
Manager Signature

\_\_\_\_\_  
Date

**Note: This notice must be posted annually.**

# Access to Employee Medical & Exposure Records Policy

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California Requirement Only

### ACCESS TO MEDICAL AND EXPOSURE RECORDS



BY CAL/OSHA REGULATION  
- GENERAL INDUSTRY SAFETY ORDER [3204](#) -  
YOU HAVE THE RIGHT TO SEE AND COPY:

- Your medical records and records of exposure to toxic substances or harmful physical agents.
- Records of exposure to toxic substances or harmful physical agents of other employees with work conditions similar to yours.
- Safety Data Sheets (SDS) or other information that exists for chemicals or substances used in the workplace, or which employees may be exposed.

THESE RECORDS ARE AVAILABLE AT: \_\_\_\_\_

(Location)

FROM: \_\_\_\_\_

(Person Responsible)

A COPY OF THE GENERAL INDUSTRY SAFETY ORDER [3204](#)  
IS AVAILABLE FROM: \_\_\_\_\_

The above information satisfies the requirements of GISO [3204](#) (g), which may be fulfilled by posting this placard in the workplace, or by any similar method the employer chooses.



January 2015

State of California  
Department of Industrial Relations  
Division of Occupational Safety and Health  
1515 Clay Street, Suite 1901  
Oakland, CA 94612  
Phone: (510) 286-7000  
Fax: (510) 286-7037

# OSHA Recordkeeping

## Tab 18

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### PURPOSE

The purpose of this policy is to establish procedures for the documentation and reporting of all work-related employee fatalities, injuries and/or illnesses in compliance with all requirements of 29 CFR 1904.

### REFERENCES

Occupational Safety and Health Administration (OSHA) 29 CFR 1904.

### SCOPE

This policy applies to all Allied Universal entities, who will maintain all OSHA recordkeeping documentation using an online recordkeeping system.

### RESPONSIBILITIES

**The Regional President, or their designee, is responsible to:**

- Assign one or more individuals to assume the title and responsibilities of an “OSHA Administrator,”
- Manage performance of OSHA Administrators to maintain compliance with the requirements of this policy.

**The local OSHA Administrator is responsible to:**

- Determine the recordability of injury/illness cases, and
- Complete required documentation to record all cases in a timely manner, and
- Contact the corporate Risk Management department for guidance as needed.

**The corporate Risk Management department is responsible to:**

- Provide training and support to all OSHA Administrators, and
- Audit documentation periodically for accuracy and compliance with this policy, and
- Review records prior to finalizing the annual OSHA Log
- Maintain this policy and update as needed.

### RECORDABILITY

1. OSHA Administrators will use the process outlined in Appendix 18.1 to determine if a case should or should not be classified as OSHA Recordable.
2. In specific instances where applicable, the nine exceptions to work-relatedness, as detailed in 29 CFR 1904.5(b)(2), and two exceptions for travel status, as detailed in 29 CFR 1904.5(b)(6), will be applied to maintain accurate records in compliance with the overall 1904 standard.
3. When OSHA Administrators are uncertain how to proceed or classify a case, they will contact the corporate Risk Management department for guidance.

# OSHA Recordkeeping

## Tab 18

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### RECORDKEEPING

1. Within seven calendar days of receiving information that treatment for a work-related employee injury and/or illness has triggered Recordability, the case details will be documented on the OSHA 300 Log for the current calendar year.
2. All OSHA 300 Logs, 300A Form summaries, and individual case records related to OSHA Record keeping will be maintained for a minimum time period of 5 years.
3. Under the rule of 29 CFR 1904.2, Allied Universal Security Services is exempt from the requirements to complete the annual OSHA 300A Summary with a signature and exempt from posting the annual OSHA 300A Summary in a visible location for the traditional time period (from February 1 through April 30 of the following year).
  - The Standard Industrial Classification code for Allied Universal Security Services is 7381.
  - Upon request OSHA Administrators will provide current and/or prospective clients with the prior year(s) corporate OSHA 300 Log(s) and/or OSHA 300A Summary. The OSHA 300A Summary will NOT include the signature of a company official.

### DOCUMENTATION

1. OSHA Administrators will maintain files with records pertaining to each injury/illness case; these files will be separate from the employee's personnel file.
2. All files will be maintained for a minimum period of five years.

### TRAINING

1. Each OSHA Administrator will complete the following training prior to assuming the duties of the role:
  - OSHA Recordability Training – a review of 29 CFR 1904, includes how to determine if a case is OSHA Recordable, and potential exemptions.
  - Recordkeeping Training – a hands-on training session instructing users on the process of maintaining records electronically using the online system.
2. Additional training is available periodically and upon request.
3. All OSHA Administrators will receive additional training if/when changes to the process are implemented.

# OSHA Recordkeeping

## Tab 18

### 5-STEP PROCESS TO DETERMINE OSHA RECORDABILITY - APPENDIX 18.1

1. Did the employee experience an injury or illness? If Yes, continue; if No, the case is not recordable.
2. Is the injury or illness work related? If Yes, continue; if No (or if uncertain), consult with Julie Havel.
3. Did the employee die or become unconscious? If Yes, the case is recordable; if No, continue.
4. Did the employee lose days away from work or return to work with work restrictions? If Yes, the case is recordable; if No, continue.
5. Did the employee receive medical treatment beyond first aid (see below)? If Yes, the case is recordable; if No, the case is not recordable.

	<b>Medical Treatment (Recordable)</b>	<b>First Aid (Non-recordable)</b>
<b>Visit to Health Care Professional</b>	<ul style="list-style-type: none"> <li>• Any treatment beyond that which is defined as first aid</li> <li>• Physician <i>prescription or referral</i> for Physical Therapy or Chiropractic care</li> <li>• Hospitalization (admitted) for treatment</li> </ul>	<ul style="list-style-type: none"> <li>• Diagnostic procedures, including prescribing or administering prescription medication used solely for diagnostic purposes</li> <li>• Visits for counseling, observation, testing or to evaluate diagnostic decisions</li> <li>• Hospitalization of observation purposes only</li> <li>• Procedures defined as first aid</li> </ul>
<b>Cuts, Lacerations, Punctures and Abrasions</b>	<ul style="list-style-type: none"> <li>• Stitches, sutures, staples</li> <li>• Medications or ointments (see below)</li> <li>• Cutting away dead skin</li> </ul>	<ul style="list-style-type: none"> <li>• Wound coverings or bandages: Band-Aids™, gauze pads, butterfly bandages or Steri-strips™</li> <li>• Liquid bandage</li> <li>• Cleaning, flushing or soaking skin wounds</li> </ul>
<b>Inoculations</b>	Hepatitis B or Rabies vaccine	Tetanus immunizations
<b>Splinters</b>	Foreign bodies which require more than simple means of removal because of their location, depth of penetration, size or shape	<ul style="list-style-type: none"> <li>• Removing foreign bodies from the eye using only irrigation or a cotton swab</li> <li>• Removing foreign bodies from other body areas by irrigation, tweezers, cotton swabs, pins, etc.</li> </ul>
<b>Strains, Sprains, Dislocations</b>	<ul style="list-style-type: none"> <li>• Any cast or other professional means of immobilizing injured part</li> <li>• Splints with rigid stays</li> <li>• Chiropractic manipulation</li> <li>• Physical Therapy</li> </ul>	<ul style="list-style-type: none"> <li>• Hot or cold therapy, or use of massage</li> <li>• Any non-rigid means of support, such as elastic bandages, wraps, non-rigid back belts, etc.</li> <li>• Temporary immobilization devices while transporting accident victim</li> </ul>
<b>Burns, Blisters or Rashes</b>	Any medical treatment or treatment beyond first aid	<ul style="list-style-type: none"> <li>• Draining fluid from a blister</li> <li>• Any other first aid treatment</li> </ul>
<b>Bruises/ Contusions</b>	<ul style="list-style-type: none"> <li>• Draining of bruises by needle</li> </ul>	<ul style="list-style-type: none"> <li>• Soaking therapy</li> <li>• Hot or cold compresses</li> </ul>
<b>Medications</b>	<ul style="list-style-type: none"> <li>• Prescription medication given once or ongoing, including samples</li> <li>• Prescription medication, whether than prescription was filled or taken or not</li> <li>• Non-prescription medication administered or prescribed at prescription strength</li> </ul>	Non-prescription medicines at non-prescription strength, whether in ointment, cream, pill, liquid, spray or other form
<b>Oxygen</b>	Oxygen administered to an employee who exhibits symptoms of an injury or illness	Oxygen administered purely as a precautionary measure who does not exhibit any symptoms of an injury or illness
<b>Loss of Consciousness</b>	Loss of consciousness which results from a workplace event or exposure (i.e. injury, heat, chemicals, oxygen deficiency, etc.)	
<b>Other</b>	<ul style="list-style-type: none"> <li>• Other significant injuries or illnesses:               <ul style="list-style-type: none"> <li>• Fractured or broken bones or teeth</li> <li>• Heart attack, if deemed work-related</li> <li>• Chronic irreversible diseases; cancer</li> <li>• Punctured ear drums</li> <li>• Needle stick injuries</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Negative x-ray</li> <li>• Replacement of broken eyeglasses</li> </ul>



# OSHA Inspections

## Tab 19

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### **PURPOSE**

This program addresses The Occupational Safety and Health Administration's (OSHA) right to inspect employer workplaces. This program also addresses action steps each office or customer site should take before and during an OSHA visit.

NOTE: Should you receive a letter from OSHA it must immediately be forwarded onto the Risk Management department.

### **SCOPE**

This program outlines; (1) how to prepare for an OSHA inspection, (2) what to do when OSHA arrives, (3) the overall inspection process.

### **APPLICATION**

This program applies to all Allied Universal sites.

### **OVERVIEW**

OSHA and other regulatory agency inspectors have a legal right to enter the workplace and conduct inspections. They usually arrive unannounced. The inspections may take place during normal business hours or any other reasonable time. Several reasons can trigger an OSHA inspection including; a serious accident or fatality, an employee complaint, a follow-up to previous citations, or a programmed high-hazard inspection (high accident numbers reported to the US Site of Labor). Allied Universal reserves the right to require an OSHA inspector to obtain a search warrant for the inspection. However, this is not advised.

### **Before an Inspection:**

Before an OSHA inspector arrives at your site, there are several action steps you can take to be prepared. These steps are;

- Designate an inspection team to accompany the OSHA inspector on the site inspection. The team should be comprised of senior management and include backups.
- Review the Injury & Illness Prevention Plan and other safety manual programs to implement them in compliance with Allied Universal standards. Be sure employees have been trained on these programs. OSHA has the right to assess employee understanding of company safety programs.
- Make sure all records (OSHA 300 Log, training records, accident investigations, etc.) are available and updated.
- Conduct periodic hazard inspections throughout the workplace and maintain documentation of inspections.

### **The Inspection:**

When an OSHA inspector arrives at your site, several steps need to be taken. This portion of the program outlines action steps to be taken from the time an inspector arrives at the site, to the end of the Closing Conference. Two Allied Universal representatives will take part in all aspects of the inspection as listed below.

# OSHA Inspections

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### When the Inspector Arrives:

- The Allied Universal Account Manager and/or Branch/Area Manager will be notified immediately. Notify your client representative of the situation before the Opening Conference.
- The account manager or his designee is to ask to see the inspector's photo identification. Make note of the inspector's name and ask for the name of their supervisor.
- Have the inspector sign the Visitor's Log and escort them to an office or conference room to hold an Opening Conference. (At this time you may wish to confirm the identity of the inspector by contacting the inspector's office)

Contact the Corporate Safety Manager Bill Thompson at (657) 264-6960, if not available, contact the Safety Program Manager Patricia Lee (484) 241-7962. If neither are available, you may contact the Service Assurance Center **(1-800-260-0852)** for immediate assistance.

### The Opening Conference:

During the Opening Conference ask the inspector the following:

1. The reason for the inspection,
2. What the scope of the inspection will be, and
3. What will be the estimated time duration of the inspection.

Provide the inspector with requested documents. Do not allow access to site files. If the inspector would like copies of specific documents, document what was provided in a letter to the compliance officer. Answer all questions honestly and do not offer information that is not requested. Take good notes, including which documents were provided to the inspector for review and when they were provided.

The OSHA inspector shall review the injury and illness records to the extent necessary to determine compliance and identify potential hazards. Other safety programs and records may be reviewed at the Inspector's professional discretion or as necessary. It is acceptable to ask the Inspector to issue a "Document Request Form" for requested records. For all planned investigation, the site are to coordinate with the Safety/Risk Management team to monitor what information will be disclosed.

# OSHA Inspections

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### The Site Tour:

- Escort the inspector at all times during the site tour.
- Take the inspector directly to the area they wish to inspect. They may also want to interview employees; you may request to observe the interview(s).
- Take notes regarding all items that interest the inspector.
- Take photos of anything the inspector photographs.
- If possible, immediately correct any safety violations or hazards noted by the inspector.

### The Closing Conference:

- Escort the inspector back to the office or conference room.
- The inspector will discuss what he/she has seen and may request more documents or schedule another day to complete the inspection. Be sure to take good notes.

When the inspection is complete the OSHA inspector will review their findings with their superiors and determine if a citation is to be issued. If a citation is received forward it onto the Risk Management department.

With direction from the Risk Management Department, the Branch Manager is responsible to all aspects of response regarding any Notices or Citations issued as a result of an OSHA Inspection. The Branch Manager will:

- Maintain communications with OSHA
- Make payment for any/all OSHA citation fees
- Develop a corrective action plan to address issues identified during the inspection
- Manage the corrective actions to completion

# OSHA Inspections

## Tab 19

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# Safety Committees

## Tab 20

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### **PURPOSE**

Safety committees can be effective at improving workplace safety and leading the company safety culture. This section provides guidance to management in developing and maintaining goal-oriented safety committees throughout Allied Universal.

### **SCOPE**

This document outlines the minimum requirements/guidelines for the operation of safety committees at the region and/or branch level.

### **APPLICATION**

All operating regions of Allied Universal will maintain active safety committees for each branch. Additionally, the National Safety Committee will operate at the corporate level with representation from all operating regions, as well as other stakeholders.

### **RESPONSIBILITIES**

The Executive Council of the National Safety Committee is responsible for:

- Hosting quarterly meetings for the National Safety Committee.
- Driving safety performance improvements throughout the corporation by establishing goals and objectives, measuring performance and leading safety initiatives.

The President of each region is responsible for:

- Appointing the regional representative(s) to serve on the National Safety Committee as a Regional Safety Champion.
- Driving safety performance improvements throughout the region by ensuring that branch safety committees are staffed and actively engaged.
- Approving/providing the resources needed for the operation of the branch safety committees.
- Evaluating the performance of the branch safety committees to hold them accountable for the activities and goals set forth in their charter.
- Verbally promoting safety to employees at all levels of the organization.

The Regional Safety Champion is responsible for:

- Driving safety performance improvements throughout the region in partnership with the region President.
- Attending all National Safety Committee meetings, or ensuring an alternative representative participates.
- Serving as a liaison between the National Safety Committee, the Region President and the Branch Safety Committees.
- Regularly discussing safety issues and gathering input from operations management.
- Verbally promoting safety to employees at all levels of the organization.
- Leading by example; demonstrating safety commitment through actions and by engaging others in safety activities.

# Safety Committees

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The Branch Safety Committee is responsible for:

- Creating a committee charter.
- Establishing goals annually.
- Meeting regularly to advance incident prevention efforts, promoting a strong safety culture and responding to local safety need

### **POLICY**

Allied Universal encourages the involvement of employees, at all levels of the organization, in the effort to create and maintain a safe workplace and culture. Employees who participate formally by joining a safety committee, or informally through safety activities, play a part in maintaining a safe workplace, strengthening our safety culture and preventing the negative consequences of safety incidents. Safety committees, made up of a group of management and employee representatives, can be highly effective at various levels in the organization to proactively address issues and prevent safety incidents, and are expected to be active in every branch.

The National Safety Committee meets at least quarterly to address safety trends, initiatives and best practices throughout the company. Each operating region and several other employee groups are represented by one or more National Safety Committee members, who are known as Safety Champions. Safety Champions represent their group and serve to communicate local issues and efforts to the National level, and in turn bring information from the National Safety Committee to their local areas. Safety Champions are responsible for leading the safety effort in their respective areas and their branch/local safety committee(s).

At the regional, branch, site or market levels, safety committees should be assembled to meet on a regular basis to address local safety issues and support corporate safety initiatives. Each branch/local safety committee will create a charter document to outline the mission/purpose of the committee and detail how membership, meetings, action items, communications and other aspects of the committee's work will be handled.

### **Branch Safety Committees will:**

- Create a Safety Committee Charter to outline the purpose of the committee and plan for how the committee will operate. Appendix 20.1 of this tab provides a template that can be used to create this charter. If a committee chooses to write a different charter it will include at least the following elements:
  - Scope
  - Purpose
  - Goals
  - Strategies
  - Representatives
  - Training
  - Meetings
  - Attendance
  - Agenda
  - Communications Plan

# Safety Committees

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- Annually establish proactive SMART goals. These goals will specify measurable activities that focus on incident prevention methods throughout the year. Branch safety goals can support a reduction in incident rates or frequency, but the goal will not specify a reduction target.
- Engage in activities to proactively reduce risk of injury or illness to employees.
- Utilize the tools and resources available through the company safety web page.

# Safety Committees

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### SAFETY COMMITTEE CHARTER - APPENDIX 20.1

1. Scope
2. Purpose
3. Goals
4. Strategies
5. Representatives
6. Training
7. Meetings
8. Attendance
9. Agenda
10. Communications Plan

#### SCOPE

The name of the committee is the \_\_\_\_\_ Safety Committee. This committee will work to serve the safety needs of \_\_\_\_\_.

#### PURPOSE

The purpose of this committee is to create, support and maintain a safety program and a safe working environment for employees of \_\_\_\_\_. By achieving this purpose we will protect our peers from injury and illness and enable our team members to provide professional, competent and committed service to our clients.

#### GOALS

The \_\_\_\_\_ Safety Committee will establish at least two local goals annually. Each goal will be Specific, Measureable, Actionable, Relevant and Time-bound (SMART). These goals are designed to improve safety and will NOT directly relate to the frequency or rate of injuries/illnesses reported.

#### 2019 GOALS

1. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
2. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

#### STRATEGIES

The \_\_\_\_\_ Safety Committee has four strategies to meet its goal and purpose:

1. Involve employees in achieving a safe, healthy workplace through committee participation, project engagement, proactive safety measures, events and safety suggestion/reporting programs.
2. Communicate about safety and address safety issues proactively before an incident occurs.



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3. Set performance goals and track progress related to proactive safety activities. These SMART goals will not relate directly to the frequency or rate of injuries or illnesses reported.
4. Promptly review all safety-related suggestions or complaints and hazard reports; investigate near miss, injury or illness incidents and vehicle accidents to find lessons learned and corrective actions.

### REPRESENTATIVES

The \_\_\_\_\_ Safety Committee is comprised of an adequate number of members to sufficiently address the scope/area that the committee serves and the workload assumed by the committee; a minimum of five members. Members will include a variety of representatives from management, site supervisors, security professionals and/or support staff, and may be appointed or volunteer to participate on the committee. In addition to regular committee members, the committee may invite guests to participate in meetings and events.

Members will rotate on-to and off-of the safety committee periodically. Members are expected to serve a minimum of nine months of service. The two named positions on the committee will be:

**Chairperson** - This member leads the monthly committee meetings and tracks the committee's progress toward achieving the annual goals. The chairperson serves an annual term.

**Secretary** - This member documents the committee's meetings and activities, and executes the communication plan. The secretary serves an annual term; whenever possible this member will transition to the role of the chairperson following their year as the secretary.

### COMMITTEE MEMBERS:

Chair: \_\_\_\_\_  
Secretary: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

### TRAINING

The minimum training requirement for each committee member is to complete:

- The "Completing a JSA" training course on The EDGE
- The complete set of [Safety Manual Quizzes](#)

Committee members will complete (or have already completed) training in the safety committee's functions. Collectively, members of the committee should have training in a variety of areas that represent the work-area exposures; this may include bloodborne pathogens, fire safety, vehicle safety, use of force, specialized patrol vehicles, personal protective equipment, fall prevention, workplace violence, etc.

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### MEETINGS

Meetings will be held monthly to execute the committee's strategies and track progress of the annual goals.

### ATTENDANCE

Each named representative on the committee will attend each scheduled meeting. Any representative unable to attend a meeting will appoint an alternate to attend in their absence and inform the chair before the meeting.

### AGENDA

The committee chairperson will create and distribute an agenda to members and guests prior to each meeting. The agenda will include items such as:

- Review progress toward annual goals.
- Discussion of any updates from the National Safety Committee.
- Status report of employee safety and health suggestions/concerns under review.
- Review incident investigations or new safety and health suggestions/concerns.
  - Confirm Root Cause Analysis and Corrective Action Plans are in place

### COMMUNICATIONS PLAN

The committee will communicate about their activities, concerns and achievements to three primary stakeholders: security professionals, management and their safety champion(s). This communications plan outlines how the committee will communicate with these groups regularly throughout the year.

The committee's plan to communicate with security professionals:

- Who: \_\_\_\_\_  
\_\_\_\_\_
- When: \_\_\_\_\_  
\_\_\_\_\_
- How: \_\_\_\_\_  
\_\_\_\_\_

The committee's plan to communicate with management (including the VP of Operations):

- Who: \_\_\_\_\_  
\_\_\_\_\_
- When: \_\_\_\_\_  
\_\_\_\_\_
- How: \_\_\_\_\_  
\_\_\_\_\_

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The committee's plan to communicate with the Regional Safety Champion(s) who represents the region on the National Safety Committee:

- Who: \_\_\_\_\_  
\_\_\_\_\_
- When: \_\_\_\_\_  
\_\_\_\_\_
- How: \_\_\_\_\_  
\_\_\_\_\_

# Vendor Verification Services

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### PURPOSE

This document provides guidance to Allied Universal sites on how to communicate with and comply with the requirements of our clients through various third party organizations, broadly known as vendor verification services.

### SCOPE

This document, and all appendices of this document, apply **solely** to those sites of operation at which the client uses a vendor verification service.

### RESPONSIBILITIES

#### Employees have the responsibility to:

- Be familiar with and comply with the requirements of any appendices in the section with apply to their site of operation.

#### Supervisors/Managers have the responsibility to:

- Identify and implement those elements of this section apply to their site of operation.
- Communicate applicable requirements to their employees and provide resource, such as training, equipment, etc. to keep employees safe and enable compliance.

#### The assigned Account Representatives have the responsibility to:

- Manage the client relationship, requirements and client-specific score for each vendor verification service.
- Monitor the vendor verification service for action items specific to their client(s) and take sole responsibility for their client's score.
- Check client scores periodically and respond in a timely manner to resolve client-specific action items, solely for their assigned client(s).
- Never supply any information or response to action items related to company policy or safety performance metrics. Communicate with the Risk Management Department in the event that such corporate action items are impacting their score.
- Notify the Risk Management Department if there is a change in assignment of the individual account representative.

#### The Corporate Risk Management Department has the responsibility to:

- Notify management when a communication has been received regarding a clients' intent to utilize a vendor verification service.
- Serve as the primary administrator for vendor verification services and provide online site access to Account Representatives.
- Maintain a list of assigned Account Representatives for all clients using specified vendor verification services.
- Submit corporate information, such as incident rates and safety policies, to vendor verification services in a timely manner.
- Coordinate payment of annual fees for vendor verification service companies.

# Vendor Verification Services

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### DEFINITIONS

**Vendor verification service** means a third-party entity contracted by a client to receive and approve certain information from Allied Universal, including Certificates of Insurance (COI), safety policies, safety performance metrics and other related information.

### POLICY

When an Allied Universal client, with an existing contract, communicates their requirement to use a specific vendor verification service, Allied Universal will take action to meet such requirements. These communications are typically received by the corporate office. Upon receipt, a member of the Risk Management Department will share the communication with operations in order to identify which manager will be the assigned Account Representative for the client.

Allied Universal management will assign an Account Representative per client for each vendor verification service. The Account Representative will maintain compliance with the requirements specific to the individual client. Each vendor verification service company is unique, but this work generally entails providing insurance certificates and some operations details.

The Account Representative will periodically access the vendor verification service website/system to proactively assess the score and identify/respond to open action items which are specific to their client. Account Representative will generally not receive communications or updates to their Allied Universal email account.

A separation exists between client-specific account details and the corporate information which must be submitted on behalf of all Allied Universal accounts. The Risk Management Department will solely maintain and submit all corporate policies and safety performance metrics. No Account Representative has authorization to answer questions, enter data or submit documents related to corporate policies or safety performance metrics.

The Account Representative will notify the Risk Management Department, by emailing [safety@aus.com](mailto:safety@aus.com), of any corporate action items which may be negatively affecting their clients' score.

The fees associated with maintaining compliance with and use of vendor verification service accounts may be allocated and billed back to the individual client who requires the use of the service.

Clients using vendor verification services may communicate specific policy and training requirements which extend beyond the scope of the Allied Universal Safety Manual. The appendix documents attached to this section outline how operators will meet such requirements.

### APPENDICES

The following list of appendices have been developed for use at sites where our clients have communicated these requirements through a vendor verification service. These additional requirements will be implemented and managed by site operators.

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### Current List of Appendix Documents:

Appendix 21.1	Stop Work Authority
Appendix 21.2	Short Service Employees
Appendix 21.3	Manual Lifting
Appendix 21.4	Working Alone
Appendix 21.5	Fatigue Management
Appendix 21.6	Process Safety Management
Appendix 21.7	Ammonia
Appendix 21.8	Benzene
Appendix 21.9	Hydrogen Sulfide
Appendix 21.10	Asbestos
Appendix 21.11	Lead
Appendix 21.12	Radiation Safety – Xray Security Equipment

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### Appendix 21.1 Stop Work Authority (SWA)

#### **PURPOSE**

The Stop Work Authority (SWA) process has been developed to empower employees to stop foreseeable and serious incidents from occurring in their work area.

#### **SCOPE**

This document applies only to sites where the host client has provided written approval for Allied Universal to implement Stop Work Authority.

The scope of this program includes situations in which Allied Universal employees may stop work in situations deemed to pose a serious risk to life or property.

#### **RESPONSIBILITIES**

At sites where Stop Work Authority is implemented, **Management** will:

- Establish and support clear expectations to exercise SWA.
- Create a culture where SWA is exercised freely.
- Hold accountable those who do not comply with established SWA.

At sites where Stop Work Authority is implemented, **Supervisors** will:

- Create a culture where SWA is exercised and honored freely.
- Evaluate concerns and resolve issues before operations resume follow the stop of work.
- Recognize proactive employee participation.
- Provide training, support, documentation and monitors compliance of the SWA program.

At sites where Stop Work Authority is implemented, **Employees** will:

- Initiate Stop Work Authority, in accordance with their training, when the situation warrants.
- Support a SWA initiated by others.

#### **Situations that may require a Stop Work Action**

Stop Work Authority should be initiated for situations which pose a serious risk to life or property. Situations that warrant a SWA may include, but are not limited to the following:

1. Alarms
2. Change in conditions
3. Changes to scope of work or work plan
4. Emergency situation
5. Equipment used improperly
6. Lack of knowledge, understanding or information
7. Serious near-miss incident
8. Unsafe conditions

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### Stop Work Authority Process

Stop Work Authority is a five step process - stop, notify, investigate, correct and resume.

#### 1. Stop

All Allied Universal employees have the right and authority to implement Stop Work Authority at sites where this process is implemented. When any Allied Universal employee perceives a situation that poses imminent danger to a person(s), equipment or environment he or she must immediately initiate a stop work intervention with the person(s) potentially at risk. The AU employee should not put themselves in the way of harm in doing so.

This action should be initiated in a non-combative manner. In situations where a supervisor is immediately available, the stop work will be initiated through the supervisor.

#### 2. Notify

Notify affected employees/persons and supervision of the stop work action. If necessary, stop work activities that are associated with the work area in question. The AU employee should not put themselves in the way of harm in doing so.

#### 3. Investigate

Affected groups, including Supervisors, will convene in a safe location to discuss the situation. All parties need to come to an agreement that the hazard(s) have been eliminated or mitigated, the situation is safe and concerns have been adequately addressed before work may resume.

#### 4. Correct

Where modifications to the affected area(s) have been deemed necessary, those will be made to eliminate or mitigate hazards to the satisfaction of affected groups. Affected area(s) shall be inspected by a qualified Supervisor to verify completeness of the modifications and to verify all safety issues have been properly resolved.

#### 5. Resume

The affected area(s) will be reopened for work by personnel with restart authority. All affected employees and contractors will be notified of what corrective actions were implemented and that work will recommence.

### FOLLOW-UP

Supervisors will review the post-specific JSA to determine if any potential opportunities for improvement and lessons learned may exist.

Stop Work interventions shall be documented for lessons learned and corrective measures put into place. Management will promptly review all stop work reports in order to identify any additional investigation or required follow-up.



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Stop Work reports shall be reviewed by the AU supervisor/leader in order to measure participation, determine quality of interventions and follow-up, trend common issues, identify opportunities for improvement and facilitate sharing of learning.

Any form of retribution or intimidation directed at any individual or company for exercising their right to issue a stop work authority will not be tolerated.

The desired outcome of any Stop Work Intervention is to identify safety concerns addressed to the satisfaction of all involved prior to resuming work. Most issues can be adequately resolved in a timely manner at the job site. Occasionally an investigation and corrective action may be required to identify and address root cause (s).

### **TRAINING**

Employees shall receive Stop Work Authority (SWA) training before their initial assignment. Training will be documented to include employee and trainer name, topic (s) discussed and date of training.

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### Appendix 21.2 Short Service Employees

#### **PURPOSE**

This program is intended to help new Allied Universal employees, whether experienced or inexperienced, work safely and on the job.

#### **SCOPE**

This document applies only to sites where the host client has provided written notice of the requirement for Allied Universal to maintain a Short Service Employee (SSE) guideline.

This program addressed the unique safety needs for newly placed employees with less than one month of experience in assigned job, working at client sites locations/ facilities.

#### **DEFINITIONS**

Mentoring - a process of transferring skills and knowledge from one person to another in a work environment.

Supervisor – The individual responsible for the direct supervision and oversight of an employee.

Short Service Employee (SSE) – A newly placed full-time or temporary employee or subcontractor with less than one month of experience in assigned job.

Mentor- Person with at least 6 months' employment with the company who has demonstrated safe and efficient work habits.

#### **RESPONSIBILITIES**

At sites where this guideline is implemented, **Management** will:

- Set expectations, evaluate effectiveness and demonstrate a personal commitment to a strong and functional safety culture.
- Review performance and take timely corrective actions to continually improve the effectiveness of the SSE guidelines.

At sites where this guideline is implemented, **Supervisors** will:

- Be familiar with which jobs and crews currently have SSE.
- Provide a mentor for each SSE.
- Notify the host client when a SSE has begun work at the site.

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At sites where this guideline is implemented, **Employees** will:

- Actively and willingly learn how to perform their work tasks safely from their mentor.
- Participate in all assigned training sessions and safety meetings.
- Follow all safety rules and company policies.
- Raise safety questions, concerns or suggestions to their mentor and/or supervisor.

### SHORT SERVICE EMPLOYEE GUIDELINES

#### Procedure

Supervisors will verify that all new, transferred and temporary employees working for Allied Universal have been through Safety Orientation and have complete knowledge of the expectations for their job function.

Supervisors will identify all employees and temporary personnel, or other employees who will return to a mentoring status for improvement in job and/or safety performance. The supervisor will notify the host client whenever an employee is working as a SSE. Allied Universal does not generally use sub-contractors, but will notify the client in the event that a sub-contractor will be hired as a SSE.

Each SSE will be assigned a mentor to work with while they are in the SSE program. The mentor will be a knowledgeable person who is familiar with the assigned job and has already completed all necessary training requirements. The mentor will coach and assist the SSE to become familiar with how to perform their job duties safely.

Employees will remain in the SSE program initially upon assignment for up to the first month on the job. During the period when an employee is in the SSE program, the mentor and supervisor will observe the SSE for compliance with safety policies and procedures. If a SSE shows non-compliance the supervisor or mentor will immediately counsel the SSE to correct the behavior.

Once a SSE has completed all assigned training for the assigned post(s) they will be graduate from the program. Upon graduation employees may then work alone and no longer need to be identified as a SSE.

#### Identification System

It is important for supervisors, and co-workers to recognize a Short Service Employee, therefore, an identification system is necessary. Each site at which these guidelines are implemented will create a system used to visibly identify SSEs. This identifier could be a wrist band or hat, for example; the identifier will comply with uniform and PPE requirements, and will not be demeaning or cause risk or harm to a SSE.

Short Service Employees may not work alone and must be accompanied by their mentor or an experienced co-worker.

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### **Orientation**

SSEs will go through safety orientation training. The orientation will include review of Allied Universal's safety manual.

Before performing work, each SSE will be provided orientation based on the Job Safety Analysis for the job position and job-related topics. SSE will be taught how to access company policies, standards and procedures. Satisfactory completion of the orientation must be signed and dated by the employee and supervisor.

### **Training**

The supervisor will provide each SSE with all retrained training for the assigned job tasks. Training will be completed in compliance with the scheduling requirements detailed in the Safety Manual.

Upon completion of training, the supervisor signs off and forwards notification form to the HRC. All records for the SSE Orientation and Training should be maintained at the employee's location by the Supervisor and by the HRC.

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### Appendix 21.3 Manual Lifting

#### **PURPOSE**

The purpose of this document is to prevent injuries to Allied Universal employees related to lifting tasks.

#### **SCOPE**

The scope of this document includes hazard identification, incident prevention and response and employee training and management.

This document applies only to sites using vendor verification services where employees perform manual lifting tasks.

#### **DEFINITIONS**

- **Manual Lifting** means a work task that requires an Allied Universal employee to lift a load that weighs more than 50 pounds.
- **Assisted Lift** means additional people will assist to help move an object.

#### **RESPONSIBILITIES**

At sites where manual lifts are performed, **Managers/ Supervisors** will:

- Evaluate the workplace for manual lifting tasks and document those in the JSA.
- Work with the host client to implement Engineering controls, where possible.
- Conduct incident investigations and implement corrective actions.
- Provide lifting equipment and PPE to affected employees, at no cost to employees.
- Periodically assess lifting equipment and PPE for safe condition and use.
- Periodically observe employees performing manual lifts.
- Provide safety training on manual lifting, use of equipment and PPE.

At sites where manual lifts are performed, **Employees** will:

- Assess the lift before moving a load, and ask for assistance with moving a load as needed.
- Report new hazards to their manager and take part in the Job Safety Analysis process.
- Use assigned PPE and lifting equipment in compliance with training provided and manufacturers' instructions.
- Report to their manager any defects, problems or a need for replacement equipment related to PPE and lifting equipment.
- Complete training required for the post.

**Corporate Risk Management** will provide ongoing support and information about manual lifting injury prevention, lift equipment and PPE, and maintain this document.

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- I. **Hazard Identification**
- II. **Incident Prevention & Response**
- III. **Employee Training & Management**

- I. **Hazard Identification**

The Job Safety Analysis (JSA) process will be utilized to evaluate work tasks, including manual lifting tasks, for each post. Reference Tab 5 of the Corporate Safety Manual for complete JSA process details. When assessing for lifting hazards the following issues should be considered:

- The size, bulk and weight of the object.
- The height the object will be moved from and to.
- The path that will be traveled when moving the object.
- The frequency of bending, twisting, reaching.

In the event of a change in the workplace or work task, a non-routine task being assigned, or an employee report of a newly identified hazard, the post-specific JSA will be reviewed and revised as needed to document the safe work procedure.

- II. **Incident Prevention & Response**

Whenever possible, Allied Universal employees will not perform manual lifting tasks except as required in the scope of services agreed to with the host client. Where employees perform manual lifting tasks the risk of injury should be mitigated through use of engineering, administrative and PPE controls.

Where engineering controls, such as conveyers or lift tables, would reduce the risk of injury in a manual lifting task, the manager will ask the host client to implement these controls.

Where lifting equipment and/or personal protective equipment can be used to mitigate the risk of a manual lift, it will be provided to employees free of charge. Lifting equipment may include dollies, carts, hand trucks, lift-assist devices, joists and jacks. Reference Tab 13 of the Corporate Safety Manual for complete PPE program details.

Where other controls is impractical or not possible, one or more additional people can take part in an assisted lift.

In the event of a near miss or injury event from a manual lifting task, the manager will conduct the incident investigation and corrective actions in compliance with the process outlined in Tab 7 of the Corporate Safety Manual.

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### III. Employee Training & Management

Employees who are assigned to perform manual lifting tasks will be provided training which includes:

- A review of the JSA for the assigned lifting tasks. Coaching on proper lifting techniques and how to avoid musculoskeletal injuries.
- Instruction on how to use lifting equipment and how to perform an assisted lift.
- Training on any associated PPE.

Managers will periodically assess any lifting equipment and PPE used for manual lifting tasks to verify the equipment is in good working order. Managers will also periodically observe employees performing their work to assess the safety of the work and to verify all lifting equipment and PPE is being used in accordance with the manufacturer's instructions and training.

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### Appendix 21.4 Working Alone

#### **PURPOSE**

The purpose of this document is to prevent injuries and safeguard Allied Universal employees who work without others nearby.

#### **SCOPE**

The scope of this document includes how a site will plan for those working alone to maintain their safety.

This document applies only to sites where the host client has provided written notice of the requirement for Allied Universal to maintain a Working Alone guideline.

#### **DEFINITIONS**

- **Working alone** means a person has no other workers working nearby, when they cannot be seen or heard by another person, and when they cannot expect a visit from another worker or member of the public for a prolonged time period. A person who works alone is called a lone worker.

#### **RESPONSIBILITIES**

At sites where this guideline is implemented, **Managers/ Supervisors** will:

- Establish a check-in procedure for lone workers.
- Provide means of communication for lone workers.
- Provide for replacement PPE to be immediately available to lone workers.
- Provide access to policies, procedures, emergency reporting and evacuation instruction and methods to all workers.
- Include consideration for lone workers in the post-specific Job Safety Analysis.

At sites where this guideline is implemented, **Employees** will:

- Follow JSA and all other safety guidelines as communicated in the safety manual, site orientation and in training presentations.
- Report the need for safety equipment, PPE or communication devices, as well as any safety incidents, to their supervisor promptly.
- Raise safety questions, concerns or suggestions to their supervisor.

It is important to consider all situations carefully. Working alone includes all employees who may go for a period of time where they do not have direct contact with a co-worker. While it is not always hazardous to work alone, it can be in certain situations. Each job where employees will work alone will be evaluated for hazards and necessary precautions to protect employees in these situations.



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High risk activities should never be done by a lone worker. High risk activities would include working:

- underground,
- at heights,
- in confined spaces (such as tanks, grain bins or elevators, culverts, etc.),
- with electricity,
- with hazardous substances or materials,
- with materials at great pressure, or
- traveling on remote, unimproved roadways.

### **STAYING SAFE**

Allied Universal employees will follow their post orders and the elements of their post-specific Job Safety Analysis (JSA) to maintain personal safety while working alone. Other elements of the safety program, including safety equipment, PPE and training will be implemented to protect employees while working alone.

Job tasks that involve a risk level of  $\geq 9$  on the JSA should not be performed while working alone. Such tasks should be brought to the attention of the supervisor so that they can be scheduled at times when an employee is not working alone.

### **CHECK-IN PROCEDURE**

It is important that a check-in procedure be in place. Decide if a verbal check-in is adequate, or if the employee must be accounted for by a visual check. Make sure your plan is appropriate for both regular business hours as well as after main work hours.

For most lone workers, a company-issued radio or cell phone will be the main sources of contact. If a cellular phone is unreliable in your area, be sure to have alternative methods of communication available.

Employees may use Team Time and/or the Service Assurance Center as a point of contact for check-ins.

### **WORKPLACE ASSESSMENT**

The post-specific Job Safety Analysis should address hazards associated with working alone. The JSA should address any hazards associated with the length of time a person will be working alone, the means of communication available to lone workers, the nature of work which will (and will not) be performed by lone workers and emergency procedures for lone workers.

### Appendix 21.5 Fatigue Management

#### **PURPOSE**

The purpose of this document is to minimize risks associated with employee fatigue. Fatigue can significantly affect the ability to communicate clearly, work safely and productively, and react optimally in an emergency situation. Fatigue and related consequences such as unintentionally falling asleep can be significant factors in incidents and accidents.

#### **SCOPE**

This document applies only to sites where the host client has provided written notice of the requirement for Allied Universal to maintain a Fatigue Management guideline.

The scope of this document includes fitness for duty, fatigue issues related to the work environment and equipment, and employee management and training guidelines.

#### **RESPONSIBILITIES**

At sites where fatigue management guidelines are implemented, **Managers/Supervisors** will:

- Assess tasks for potential sources of fatigue and include them on the post-specific JSA.
- Respond to situations involving employee fatigue, as well as situations where medication use could affect an employee's ability to safely perform their work.
- Provide training on fatigue management to affected employees.

At sites where fatigue management guidelines are implemented, **Employees** will:

- Report fatigue conditions to their manager/supervisor.
- Report to their manager/supervisor if medication they are taking includes warnings that medication use would impact their work duties in such a way that the employee would be a direct threat to themselves or others.
- Complete required fatigue management training.

**Corporate Risk Management** will maintain this document.

- I. **Fitness for Duty**
- II. **Workplace Environment & Equipment**
- III. **Employee Management & Training**

- I. **Fitness for Duty**

Employees are expected to arrive to work prepared to perform their scheduled shift. Part of their physical and mental preparedness is to be adequately rested to be attentive to and safely perform their assigned duties.

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Before arriving to work, or during the work shift, employees should avoid using anti-fatigue products or medications that could affect the employee's ability to safely perform their work. Medication containers and information provided by the manufacturer, for both prescription and over-the-counter varieties, should be reviewed by the employee for warnings about how that medication may affect the users' ability to operate equipment and maintain mental acuity.

If an employee believes a medication they are taking may impact their ability to perform the essential functions of their job, Allied Universal will engage in an interactive process with the employee to reach a reasonable accommodation which will allow the employee to perform the essential functions of their position.

### II. Workplace Environment & Equipment

The Job Safety Analysis (JSA) process will be utilized to evaluate work tasks and potential hazards for each post. Reference Tab 5 of the Corporate Safety Manual for complete JSA process details. Fatigue issues should be considered in this analysis, including:

- Physical stressors in the work environment that can lead to fatigue, such as vibration, excessive noise and temperature extremes
- Physical exertion that can lead to fatigue, such as repeated manual lifting tasks or prolonged periods of standing, walking or climbing
- Lighting of the work environment
- Assigned hours

Where the above issues are addressed on the JSA, supervisors will look for opportunities to mitigate issues that lead to fatigue. Safety interventions may involve a wide variety of actions ranging from providing an ergonomic tool (such as a floor mat), to providing adequate lighting or a heating source in cold weather conditions. The supervisor must determine what safety controls are feasible and effective for the situation.

### III. Employee Management & Training

Employees are provided with meal and rest breaks in compliance with applicable laws and contractual specifications.

Allied Universal will limit employee's scheduled work hours to less than 16 hours per day. Supervisors may also utilize job rotation at their discretion and in compliance with all laws, regulations, contracts, agreements and training requirements.

Employees experiencing fatigue/tiredness and lack of mental acuity should report this condition to their supervisor. The supervisor will determine if a break period can be provided or if other measures may need to be taken to prevent a safety incident or loss.

Employees at sites where this guideline will be implemented will receive training on fatigue management as part of their onboarding instruction and an annual refresher training on the same topic. This training will address how to recognize fatigue, how to control fatigue and when/how to report fatigue to their supervisor.

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### Appendix 21.6 Process Safety Management (PSM)

#### **PURPOSE**

This Program has been developed to meet the requirements of our clients to address the issue of Process Safety Management (PSM). This guideline is built upon the Allied Universal Safety Manual which applies to all Allied Universal employees and separately addresses nearly all elements outlined here.

The purpose of Process Safety Management is to prevent or minimize consequences of catastrophic releases of toxic, reactive, flammable or explosive chemicals. Allied Universal will not be directly involved in the handling of hazardous materials.

#### **SCOPE**

This document applies only to sites where the host client has provided written notice of the requirement for Allied Universal to maintain a PSM guideline.

The scope of this document includes the communication of hazards in the workplace, employee training, the need to comply with company and host client policies, incident reporting and trade secrets.

#### **RESPONSIBILITIES**

At sites where the PSM guidelines will be implemented, **the AU Account Manager/Supervisor will:**

- Provide training for all security professionals on hazards of the post-specific JSA, the client's process, safe operating procedures, and safe practices.
- Monitors site activities to ensure compliance with Safety Manual and JSA requirements.
- Provide approved sub-contractors are provided the information required by the client's program.
- Document training, information, activities required by the client's program.
- Provide PSM overview indoctrination training for all new employees as part of the New Hire Safety Orientation training.

#### **PSM ELEMENTS**

1. Employee Participation
2. Process Hazard Analysis (PHA)
3. Operating Procedures
4. Training
5. Sub-Contractor Safety
6. Hot Work Program
7. Incident Reporting and Investigation
8. Trade Secrets

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### **SECTION 1 – EMPLOYEE PARTICIPATION**

Allied Universal (AU) employees are not directly involved with handling hazardous materials, hazardous forms of energy, equipment maintenance or hot work. In very specific situations some AU employees may engage in emergency response or confined space monitoring and/or rescue operations.

Employees are informed of the hazards associated with their assigned job tasks, and engaged in the process of identifying hazards and mitigation methods, through the AU Job Safety Analysis (JSA) program. A JSA is prepared for each job post, update periodically and provided to each employee upon assignment and/or revision. Reference Tab 5: Job Safety Analysis of the Allied Universal Safety Manual for complete information.

### **SECTION 2 – PROCESS HAZARD ANALYSIS**

Allied Universal (AU) employees are not directly involved with handling hazardous materials, hazardous forms of energy, equipment maintenance or hot work. In very specific situations some AU employees may engage in emergency response or confined space monitoring and/or rescue operations.

Employees will use the Allied Universal Job Safety Analysis process to identify, mitigate and communicate with peers about hazards in their workplace.

When the host client informs AU management of hazards in the general environment which could potentially impact the operations or safety of AU employees or subcontractors, the AU management will meet with the host client to become fully informed of these potential hazards. Per the JSA program, a JSA will be updated when there are changes to the work tasks or environment which pose a new hazard.

When AU employees or management becomes aware of a new hazard on the host clients' property, or when a unique hazard could be created by work performed by Allied Universal, the AU manager/ supervisor will promptly advise the host client of the situation in an email communication.

### **SECTION 3 – OPERATING PROCEDURES**

Allied Universal (AU) employees are not directly involved with handling hazardous materials, hazardous forms of energy, equipment maintenance or hot work. In very specific situations some AU employees may engage in emergency response or confined space monitoring and/or rescue operations.

As a contractor on a host client's site, AU employees shall abide by the hiring client's safe work practices during all work operations.

### **SECTION 4 - TRAINING**

All AU employees will complete training to prepare them to safely perform their job duties, initially upon assignment and periodically thereafter. Employee training content, presentation, demonstration of learning and documentation records will be conducted and maintained in accordance with Tab 4: Safety Training of the Allied Universal Safety Manual.

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Allied Universal training records will identify the title of the course, the course content, the date of completion and shall ascertain that each employee has received and understood the training requirements.

As detailed in Tab 4: Safety Training each AU employee will be instructed in the known potential fire, explosion or toxic release hazards related to their job and the applicable provisions of the emergency action plan.

### **SECTION 5 – SUB-CONTRACTORS**

In the event that Allied Universal were to bring sub-contractors on to a host clients' site, Allied Universal will inform the sub-contractors of the following requirements:

- Sub-contracts will be evaluated prior to hire to meet the host client's safety expectations for policies, employee training and performance record.
- Sub-contractors shall work in compliance with all host client's safe work practices during operations such as Lockout/Tagout, Confined Space entry, opening process equipment or piping and control over entrance to facility.

### **SECTION 6 – HOT WORK**

Allied Universal employees do not perform Hot Work operations. The supervisor will seek a work permit, and complete the JSA process, before any work tasks beyond the scope of services contractually agreed upon will be performed.

### **SECTION 7 – INCIDENT REPORTING AND INVESTIGATION**

Allied Universal employee will immediately report all accidents, injuries and near miss incidents in accordance with Tab 7: Incident Reporting and Response of the Allied Universal Safety Manual.

An incident investigation will be initiated within 48 hours. Resolutions and corrective actions must be documented and maintained on site for a minimum of 5 years.

### **SECTION 8 – TRADE SECRETS**

Allied Universal employees will respect the confidentiality of trade secret information when the process safety information is released to them.

There is no restriction in the OSHA Standard 1910.119 which prevents the company from requiring any persons to whom the information is made available to enter into confidentiality agreements not to disclose the information.

Rules and procedures set forth in OSHA Standard 1910.1200, employees and their designated representatives shall have access to trade secret information contained within the process hazard analysis and other documents required to be developed by the standard.

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### Appendix 21.7 Ammonia Awareness

#### **PURPOSE**

The purpose of this document is to inform personnel of the dangers of Anhydrous Ammonia and those precautions which are needed to protect employees from injury or illness.

#### **SCOPE**

The scope of this document includes hazard identification, information about the hazards of Anhydrous Ammonia and precautionary measures to protect employees from associated hazards.

This document applies only to sites where a potential for work-related exposure to Anhydrous Ammonia exists.

#### **RESPONSIBILITIES**

At sites where a potential for work-related exposure to Anhydrous Ammonia exists, **Managers** will:

- Evaluate the workplace for potential exposure to anhydrous ammonia, in routine and non-routine tasks, including emergency situations.
- Document all potential for exposure to anhydrous ammonia and safety precautions on the post-specific Job Safety Analysis.
- Provide appropriate PPE free of cost to employees.
- Provide training on Hazard Communication, emergency procedures related to ammonia, and personal protective equipment.

At sites where a potential for work-related exposure to Anhydrous Ammonia exists, **Employees** will:

- Take part in the JSA process to evaluate the workplace for hazards and understand and follow the expectations for each job task.
- Complete training required for the post.
- Notify their manager if replacement PPE is needed.

**Corporate Risk Management** will provide ongoing support and information about ammonia to managers and employees, and maintain this awareness document.

- I. **Information about Anhydrous Ammonia**
- II. **Hazard Identification & Potential for Exposure**
- III. **Precautionary Measures & Safety Controls**

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### I. Information about Anhydrous Ammonia

The Safety Data Sheet for Ammonia will be available to all employees with occupational exposure to reference for complete information about health hazards, material identification, personal protective equipment, first aid measures, emergency release procedures and more.

- Ammonia is an odorless, colorless gas under normal conditions. It can be a liquid under pressure. It has a pungent suffocating odor.
- High concentrations of ammonia can be a fire or explosion hazard. At high temperatures ammonia can decompose, forming very flammable hydrogen gas.
- Ammonia can be very toxic, even fatal if inhaled, and can cause harm if it comes into contact with the eyes or skin. Potential health effects include burning of the eyes, temporary blindness, coughing, chest pain, severe breathing pain, severe burns and death.

### II. Hazard Identification & Potential for Exposure

A site or branch manager is responsible to prepare a Job Safety Analysis (JSA) for all security posts and job tasks that Allied Universal employees do as part of their assigned duties. Reference Tab 5 of the Corporate Safety Manual for complete JSA process details.

Routine, non-routine and emergency response tasks will be evaluated for potential hazards and potential for exposure to ammonia. All hazards related to the potential for chemical exposure will be documented in Section G on the JSA form.

When assessing job tasks and the work environment for potential Anhydrous Ammonia exposure, the following areas should be closely evaluated:

- **Working on/near industrial refrigeration machines**
- **Working in/near petroleum refining units**
- **Working with/near agricultural fertilizer or decomposing plant material**

### III. Precautionary Measures & Safety Controls

Where employees are found to have exposure, or potential for exposure, to ammonia in their routine tasks or emergency duties management will implement controls to maintain the health and safety of employees. Controls should first attempt to eliminate or avoid exposure to the ammonia, but where this is not possible Administrative Controls or Personal Protective Equipment will be implemented to mitigate the hazard.



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No employee may attempt to enter the area or rescue someone who has become overcome or unconscious from ammonia exposure without first securing their own safety with approved use of respiratory protection. The employee must be fit tested for the respirator and must complete training on the equipment before approved to use the respirator. Any site where employees may use a respirator must implement a respirator protection program.

PPE will be provided, maintained and used in accordance with the manufacturer's recommendations to protect employees from ammonia exposure. Affected employees will complete Hazard Communication training for ammonia and training on all PPE.

- Where employees have the potential for skin exposure to ammonia they will be provided and required to use impervious clothing, gloves and/or face shields.
- Where employees have the potential to inhale ammonia gas employees will be provided and required to use appropriate respiratory protection, after medical approval, fit testing and training.

Employees will be provided training on the site emergency plans, to be knowledgeable about where ammonia is used in the facility and any ammonia-specific safety rules by the host client.

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### Appendix 21.8 Benzene Awareness

#### **PURPOSE:**

Benzene Awareness is essential to the safety of employees who work in environments where benzene is stored, transferred, processed or used. The purpose of this program is to inform personnel of the dangers of Benzene. Allied Universal (AU) employees do not perform work tasks which involve benzene exposure, but benzene may be present on the host clients' site where they work. Out of an abundance of caution, AU has established this program to address any issues as they are identified.

#### **SCOPE:**

This document applies only to sites where the host client has provided written notice of the requirement for Allied Universal to maintain a Benzene Guideline.

The scope of this document includes the characteristics, health effects and regulatory exposure limits for benzene, as well as safe work guidelines, emergency response and training.

#### **REFERENCES:**

- A) 29 CFR 1926.55, Gases, Vapors, Fumes, Dust, and Mists
- B) 29 CFR 1910.106 Flammable and combustible liquids
- C) 29 CFR 1910.1028 – Benzene (and Appendixes A-D)

#### **RESPONSIBILITIES**

At sites where a potential for work-related exposure to benzene exists, **Managers/Supervisors** will:

- Evaluate the workplace for potential exposure to benzene, in routine and non-routine tasks, including emergency situations.
- Document all potential for exposure to benzene and safety precautions on the post-specific Job Safety Analysis.
- Provide appropriate PPE free of cost to employees.
- Provide training on Hazard Communication, emergency procedures related to ammonia, and personal protective equipment.

At sites where a potential for work-related exposure to benzene exists, **Employees** will:

- Notify their manager if they believe they have work-related exposure to benzene.
- Take part in the JSA process to evaluate the workplace for hazards and understand and follow the expectations for each job task.
- Complete training required for the post.
- Notify their manager if replacement PPE is needed.

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- 1.0 PHYSICAL AND CHEMICAL CHARACTERISTICS
- 2.0 EXPOSURE AND HEALTH EFFECTS
- 3.0 REGULATORY LIMITS
- 4.0 WORKING SAFELY WITH BENZENE
- 5.0 EMERGENCY PROCEDURES
- 6.0 TRAINING

### 1.0 PHYSICAL AND CHEMICAL CHARACTERISTICS

Benzene is a clear, colorless liquid with a distinctive sweet odor. Its boiling point is 176 degrees F and its flash point is 12 degrees F. The flammable concentration limits in air are 1.3% for the low end and 7.5% for the high end. Benzene is a highly flammable liquid. Its vapors can form explosive mixtures. All ignition sources must be controlled when Benzene is used, handled, or stored. Where liquid or vapor may be released, such areas shall be considered as hazardous locations.

Benzene vapors are heavier than air; thus the vapors may travel along the ground and be ignited by open flames or sparks at locations remote from the site at which Benzene is handled. Smoking is prohibited in areas where Benzene is used or stored. Fire extinguishers must be readily available.

Benzene is classified as a 1B flammable liquid for the purpose of conforming to the requirements of 29 CFR 1910.106. A concentration exceeding 3,250 ppm is considered a potential fire explosion hazard. Locations where Benzene may be present in quantities sufficient to produce explosive or ignitable mixtures are considered Class I Group D for the purposes of conforming to the requirements of 29 CFR 1910.309.

### 2.0 EXPOSURE AND HEALTH EFFECTS

Locations where benzene exposure can occur includes but is not limited to the following:

- Petroleum refining sites
- Tank Gauging (tanks at producing, pipeline & refining operations)
- Field maintenance

Benzene is primarily an inhalation hazard. Systemic absorption may cause depression of the hematopoietic system, pancytopenia, aplastic anemia, and leukemia. Inhalation of high concentrations can affect central nervous system function. Aspiration of small amounts of liquid Benzene immediately causes pulmonary edema and hemorrhage of pulmonary tissue. There is some absorption through the skin. Absorption may be more rapid in the case of abraded skin, and Benzene may be more readily absorbed if it is present in a mixture or as a contaminant in solvents that are readily absorbed. The defatting action of Benzene may produce primary irritation due to repeated or prolonged contact with the skin. A high concentration is irritating to the eyes and the mucous membranes of the nose, and respiratory tract.

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Direct skin contact with Benzene may cause erythema. Repeated or prolonged contact may result in drying, scaling dermatitis, or development of secondary skin infections. In addition, there is Benzene absorption through the skin. Local effects of Benzene vapor or liquid on the eye are slight. Only at very high concentrations is there any sharp or stinging pain in the eye. Inhalation of high concentrations of Benzene may have an initial stimulatory effect on the central nervous system characterized by exhilaration, nervous excitation, and/or giddiness, followed by a period of depression, drowsiness, or fatigue. A sensation of tightness in the chest accompanied by breathlessness may occur and ultimately the victim may lose consciousness. Tremors, convulsions and death may follow from respiratory paralysis or circulatory collapse in a few minutes to several hours following severe exposures.

The detrimental effect on the blood-forming system of prolonged exposure to small quantities of benzene vapor is of extreme importance. The hematopoietic system is the chief target for Benzene's toxic effects that are manifested by alterations in the levels of formed elements in the peripheral blood. These effects have occurred at concentrations of Benzene that may not cause irritation of mucous membranes, or any unpleasant sensory effects. Early signs and symptoms of Benzene morbidity are varied, often not readily noticed and non-specific. Subjective complaints of headache, dizziness, and loss of appetite may precede or follow clinical signs. Rapid pulse and low blood pressure, in addition to a physical appearance of anemia, may accompany a subjective complaint of shortness of breath and excessive tiredness. Bleeding from the nose, gums, or mucous membranes, and the development of purpuric spots (small bruises) may occur as the condition progresses. Clinical evidence of leukopenia, anemia, and thrombocytopenia, singly or in combination, has been frequently reported among the first signs.

Bone marrow may appear normal, aplastic, or hyperplastic, and may not, in all situations, correlate with peripheral blood forming tissues. Because of variations in the susceptibility to Benzene morbidity, there is no "typical" blood picture. The onset of effects of prolonged Benzene exposure may be delayed for many months or years after the actual exposure has ceased and identification or correlation with Benzene exposure must be sought out in the occupational history.

### 3.0 REGULATORY LIMITS:

The permissible exposure limits for Benzene are as follows:

**Airborne:** The maximum time-weighted average (TWA) exposure limit is 1 part of Benzene vapor per million parts of air (1 ppm) for an 8-hour workday and the maximum short-term exposure limit (STEL) is 5 ppm for any 15-minute period.

**Dermal:** Eye and skin contact shall be prevented.

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### 4.0 WORKING SAFELY WITH BENZENE

Allied Universal employees are never permitted to directly access or use benzene for any reason.

Employees who believe there is Benzene exposure in their work area, will inform their Supervisor immediately. The Supervisor is responsible to investigate and report findings to AU Senior management and the client. If work-related exposure is determined, the Supervisor will modify the work to eliminate exposure.

### 5.0 EMERGENCY PROCEDURES

In a medical emergency call 911 or on site responders if available. All personnel will be aware of the site specific emergency plan.

**Inhalation:** If inhaled, move to fresh air. If not breathing give artificial respiration. If the employee has difficulty breathing, give oxygen and call for medical assistance as soon as possible.

**Skin Contact:** In case of skin contact, remove contaminated clothing and shoes and wash the exposed skin with copious amounts of soap and water for at least 15 minutes. Wash contaminated clothing thoroughly before wearing again.

**Eye Contact:** If benzene comes in contact with eyes, flush with large amounts of water for at least 15 minutes. Assure adequate flushing by separating eyelids with fingers. If irritation persists or vision appears to be affected, see a doctor as soon as possible.

**Ingestion:** If swallowed, do not induce vomiting. Call for medical assistance as soon as possible.

### 6.0 TRAINING:

All Benzene Awareness training shall be coordinated by branch management.

Employees who work at jobsites where benzene is present, shall be trained annually. Training content shall meet or exceed the Allied Universal requirements for Benzene Training, as listed in Tab 4: Safety Training of the Safety Manual.

Training shall be documented on a training sign-in sheet, copies of the training sign-in sheets must be retained for a minimum of 5 years.

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### Appendix 21.9 Hydrogen Sulfide Awareness

#### **PURPOSE**

Hydrogen Sulfide is a highly hazardous chemical that may be present at some host client sites. It is vital to the life safety of Allied Universal employees working at these sites that they understand the severity of the risks associated with Hydrogen Sulfide. Compliance with this program is mandatory at all sites where Hydrogen Sulfide may be present in the workplace. Failure to comply will result in disciplinary action and/or grounds for termination.

#### **SCOPE**

The scope of this document includes hazard identification, information about the hazards of hydrogen sulfide and precautionary measures to protect employees from associated hazards.

This document applies only to sites where a potential for work-related exposure to Hydrogen Sulfide exists.

#### **RESPONSIBILITIES**

At sites where a potential for work-related exposure to Hydrogen Sulfide exists, **Manager/ Supervisor** will:

- Evaluate the workplace for potential exposure to anhydrous ammonia, in routine and non-routine tasks, including emergency situations.
- Document all potential for exposure to anhydrous ammonia and safety precautions on the post-specific Job Safety Analysis.
- Provide appropriate PPE free of cost to employees.
- Provide training on Hazard Communication, emergency procedures related to ammonia, and personal protective equipment.
- Implement a complete Respiratory Protection Program (see Tab 13 of the Safety Manual) if any AU employees will use a respirator.

At sites where a potential for work-related exposure to Hydrogen Sulfide exists, **Employees** will:

- Take part in the JSA process to evaluate the workplace for hazards and understand and follow the expectations for each job task.
- Complete training required for the post.
- Notify their manager if replacement PPE is needed.

1.0	Introduction
2.0	Forms of Exposure
3.0	Health Effects of Exposure
4.0	Exposure Assessment
5.0	Preventing Exposure
6.0	Reporting Problems
7.0	Employee Information & Training

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### 1.0 INTRODUCTION

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Exposure to Hydrogen Sulfide occurs in many industries. Most exposures tend to be in the oil and natural gas industries. Hydrogen sulfide is an extremely toxic, flammable gas that may be present in the production of gas wells, high sulfur content crude oil, crude oil manufacturing and associated gases. Hydrogen sulfide is heavier than air, and can collect in low elevation areas. Any exposure should be avoided. If exposure cannot be avoided through ventilation, etc., proper personnel protective equipment must be used.

Employees will refer to the Job Safety Analysis and post-orders for warnings and instructions about hydrogen sulfide. Employees of Allied Universal are forbidden from entering any areas of a facility/site with concentrations of Hydrogen Sulfide.

Allied Universal employees are fully empowered to decline client directed activities if the risk of Hydrogen Sulfide is present. Further, employees are fully empowered to decline client directed activities if they feel that they have not been fully instructed, trained, provided proper equipment or been provided complete information about the risk potential involved.

Employees must communicate directly with their Supervisor, the AU account manager and the branch manager for further guidance.

### 2.0 FORMS OF EXPOSURE

Hydrogen Sulfide exposure is primarily through inhalation.

However, other exposures such as ingestion should not be overlooked. Inhalation of Hydrogen Sulfide at certain concentrations can lead to serious injury and, in some cases death.

The IDLH (Immediately Dangerous to Life and Health) level for Hydrogen Sulfide is extremely low (300 PPM). This means that a limited exposure can be fatal when inhaled. The sense of smell should NEVER be trusted as a gauge for Hydrogen Sulfide.

#### **Permissible Exposure Limits:**

Permissible Exposure Limit (PEL) - means the dermal or inhalation exposure limit established by the Occupational Safety and Health Administration (OSHA).

For general industry applications, the OSHA PEL for Hydrogen Sulfide is 20 PPM.

(29 CFR 1910.1000 Table Z-2.) \*Note this is a "ceiling limit," and is the maximum exposure allowed during any 8-hour shift. It is not time weight averaged over any period of time. This is because of the serious and immediate health effects of hydrogen sulfide as an irritant and chemical causing asphyxia having immediate health effects.

A "maximum peak" exposure of up to 50 PPM is allowed as an exception to the 20 PPM ceiling limit, but only if the exposure lasts no more than 10 minutes and only when no other measurable exposure will occur during the 8-hour shift.

For construction and shipyard environments, PEL is limited to 10 ppm over an 8-hour Time Weighted Average. (29 CFR 1926.55 Appendix A, 29 CFR 1915.1000 Table Z.)

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### 3.0 HEALTH EFFECTS OF EXPOSURE

Exposure to Hydrogen Sulfide can be fatal. If steps are not taken to control exposure, continued inhalation of Hydrogen Sulfide could result in serious health symptoms including, but not limited to:

- Loss of the sense of smell
- Nausea, tearing of eyes, headaches, dizziness
- Throat irritation and conjunctivitis
- Death

Low concentration exposures (under 10 PPM)

In low concentrations, Hydrogen Sulfide can be detectable by its odor; however, the smell cannot be relied upon to forewarn of dangerous concentrations, because it rapidly paralyzes the sense of smell. A longer exposure to the lower concentrations may result in the loss of the ability to smell the gas even though it is still present.

Symptoms from repeated exposure to low concentrations usually disappear after being removed from the exposure for a period of time.

Higher concentration exposures (10 PPM and above)

Concentrations that are prolonged or of high concentrations may lead to death.

**CAUTION:** The sense of smell will be rendered ineffective by hydrogen sulfide, which can result in an individual failing to recognize the presence of dangerously high concentrations.

Exposure to high concentrations of hydrogen sulfide are fatal.

### 4.0 EXPOSURE ASSESSMENT

At sites where this program is implemented, the Allied Universal Manager/ Supervisor will review all posts and job duties to evaluate for any possible exposure to Hydrogen Sulfide, even in emergency situations. The Manager/ Supervisors will document any such potential exposures on the post-specific Job Safety Analysis and ensure that all affected employees are provided with training.

The host client's management team or an equivalent member of their management staff will determine if employees are exposed to concentrations of hydrogen sulfide. The exposure determination shall be based on the following personal exposure monitoring of Allied Universal employees.

If the initial exposure determination reveals employee exposure to be below the PEL, continuous monitoring will be performed. In addition, continuous ventilation shall be used. Appropriate personnel protective equipment will be worn by all employees who may be exposed.



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### 5.0 PREVENTING EXPOSURE

Proper control of exposure to Hydrogen Sulfide is the responsibility of both the host client and Allied Universal. All of the control methods listed below are essential to minimize additional sources of Hydrogen Sulfide absorption from inhalation. Strict compliance with these provisions can virtually eliminate sources of Hydrogen Sulfide exposure that significantly contribute to excessive Hydrogen Sulfide absorption.

Allied Universal employees will be trained on the site specific safety programs as well as the site emergency action plan.

Ventilation systems may provide venting of the Hydrogen Sulfide gas prior to entrance into the area.

Allied Universal employees are NOT permitted to enter confined spaces at client sites, except when the employees is specifically assigned and trained to perform permit required confined space (PRCS) monitoring duties. Allied Universal employees not specifically assigned to perform PRCS monitoring will call for emergency help and will NOT enter the confined space in the event of an emergency.

Respiratory Protection shall be used in combination with continuous monitoring when warranted by the conditions of the area. It is not anticipated that AU employees will enter spaces requiring respiratory protection. If an issue arises, the AU employees are fully empowered to decline entering the area. In the event of an accidental spill, adequate PPE will be utilized. The following section of this program only applies to the use of respiratory protection in the event of an accidental spill.

Exposure to hazardous materials requires special precautions against absorption of toxic compounds. Engineering controls (e.g. ventilation systems) are the primary means of controlling exposure to Hydrogen Sulfide gas. However, if engineering controls cannot reduce hydrogen sulfide below OSHA permissible exposure limits, respiratory protection will be necessary.

If a respirator is needed to protect an Allied Universal employee, the manager/ supervisor must implement a site-specific Respiratory Protection Program, as detailed in Tab 13: Personal Protective Equipment of the Safety Manual.

The respirator will provide protection based on the nature of the hazard. Only use respirators tested and certified by the National Institute for Occupational Safety & Health (NIOSH).

The cartridges that come with the mask are approved for the environment in which you will be working.

Never use a cartridge respirator in an atmosphere containing less than 19.5% oxygen or an atmosphere immediately dangerous to life and health (IDLH). In addition, observe the requirements of the Respiratory Protection Program. In extreme cases a NIOSH- certified air purifying respirator may be required.

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Personal Protective Equipment required to protect personnel will be supplied at no cost to employees.

If a Self-contained breathing apparatus (SCBA) is to be worn, all provisions applicable to the use of respirators apply as well as the provisions of the AU Respiratory protection program.

If at any time the alarm sounds or there is an equipment malfunction, the area is to be evacuated and reevaluated prior to re-entry.

Allied Universal employees shall not enter areas where the Hydrogen Sulfide is present.

Equipment shall be operated and calibrated prior to use per the manufacturer's instructions.

Continuous monitoring shall be used when Hydrogen Sulfide has been detected.

### 6.0 REPORTING PROBLEMS

Employees will immediately notify their supervisor of the following situations:

- You develop signs or symptoms associated with Hydrogen Sulfide exposure.
- You have difficulty breathing while wearing a respirator.
- You suspect problems with other personal protective equipment.

### 7.0 EMPLOYEE INFORMATION & TRAINING

At sites where the Hydrogen Sulfide program is in effect, all affected employees will complete Hydrogen Sulfide training annually. The training program will inform employees of the following:

- The characteristics, possible sources, and hazards of Hydrogen Sulfide
- Proper use of the Hydrogen Sulfide detection methods.
- Recognition of, and proper response to Hydrogen Sulfide warnings.
- Symptoms of Hydrogen Sulfide exposure.
- Proper rescue techniques and first-aid procedures to be used in a Hydrogen Sulfide exposure.
- Proper use and maintenance of personal protective equipment. Trainees will demonstrate proficiency in use of PPE in order to complete the training course.
- Wind direction awareness.
- Use of safety equipment.
- Use and operation of all Hydrogen Sulfide monitoring systems.

Site specific training will be conducted by the site supervisor. Information and training will be given to all employees assigned to sites with potential Hydrogen Sulfide exposures. AU must rely heavily on client management for assistance in hazard identification and training resources. The branch manager is ultimately responsible for initiating contact with the client's management team when/if employees may be exposed to Hydrogen Sulfide. The training program will inform employees of the following:

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- Sources of Hydrogen Sulfide at Site/Facility
- Emergency response procedures and shutdown practices
- Locations of safety equipment
- Confined space and enclosed facility entry procedures
- Routes of egress
- Worker awareness and understanding of workplace practices and maintenance procedures to protect personnel from exposure to hydrogen sulfide

Documentation of employee training shall be retained for at least five years.

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### Appendix 21.10 Asbestos

#### **PURPOSE**

The purpose of this document is to inform personnel of the dangers of Asbestos and those precautions which are needed to protect employees from injury or illness.

#### **SCOPE**

The scope of this document includes hazard identification, information about the hazards of Asbestos and precautionary measures to protect employees from associated hazards.

This document applies only to sites where a potential for work-related exposure to Asbestos exists.

#### **RESPONSIBILITIES**

At sites where a potential for work-related exposure to Asbestos exists, **Managers** will:

- Evaluate the workplace for potential exposure to asbestos, in routine and non-routine tasks, including site maintenance/construction activities and emergency situations.
- Document all potential for exposure to asbestos and safety precautions on the post-specific Job Safety Analysis.
- Modify job duties to move employees to a safe area/distance from potential exposure to friable asbestos, and provide appropriate personal protective equipment free of cost to employees.
- Provide training on Hazard Communication, emergency procedures related to asbestos, and personal protective equipment.

At sites where a potential for work-related exposure to Asbestos exists, **Employees** will:

- Take part in the JSA process to evaluate the workplace for hazards and understand and follow the expectations for each job task.
- Complete training required for the post.
- Notify their manager if replacement PPE is needed, or raise safety concerns related to asbestos.

**Corporate Risk Management** will provide ongoing support and information about asbestos to managers and employees, and maintain this awareness document.

- I. **Information about Asbestos**
- II. **Hazard Identification & Potential for Exposure**
- III. **Precautionary Measures & Safety Controls**
- IV. **Employee Training**
- V. **Definitions**

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### I. Information about Asbestos

Asbestos is widely used, mineral-based material that is resistant to heat and corrosive chemicals. Depending of the chemical composition, fibers may range in texture from coarse to silky. The properties which make asbestos fibers so valuable to industry are its high tensile strength, flexibility, heat and chemical resistance, and good frictional properties.

When dry, an asbestos containing material (ACM) is considered **friable** if it can be crumbled, pulverized, or reduced to powder by hand pressure. Asbestos fibers are not a health hazard until they become disturbed and airborne.

Exposure to asbestos has been shown to cause lung cancer, asbestosis, mesothelioma, and cancer of the stomach and colon. Asbestos fibers are carried into the body as airborne particles. These fibers can become embedded in the tissues of the lung and digestive system. Once the fibers become trapped in the lung's alveoli (air sacs), they cannot be removed.

Years of exposure to asbestos can cause a number of disabling and fatal diseases. Among these is asbestosis, an emphysema-like condition, lung cancer; mesothelioma, a cancerous tumor that spreads rapidly in the cells of membranes covering the lungs and body organs; and gastrointestinal cancer which is caused by ingesting asbestos-contaminated food.

Recognizing the danger of asbestos levels in the workplace, the Occupational Safety and Health Administration developed a more protective regulation that reduces the permissible exposure limit and prescribes a separate standard for general industry and for construction.

#### **Short term affects (acute)**

May cause irritation and itching to the skin, coughing may occur.

#### **Long term effects**

Over exposure can result in lung cancer. Common symptoms include difficulty in breathing (if you climb a flight of steps and are out of breath) cough chest pains, clubbing of the fingers, (this common in advanced stages), risk for lung cancer is or multiplied if the worker exposed to asbestos also smokes.

### II. Hazard Identification & Potential for Exposure

Asbestos materials are used in the manufacture of heat-resistant clothing, automotive brake and clutch linings, and a variety of building materials including insulation, soundproofing, floor tiles, roofing felts, ceiling tiles, asbestos-cement pipe and sheet, and fire-resistant drywall. Asbestos is also present in pipe and boiler insulation materials, pipeline wrap and in sprayed-on materials located on beams, in crawlspaces, and between walls.

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Since non-asbestos insulation and materials is being used in most facilities on new work installations, the highest probability for exposure will come during demolition or old insulation removal. However, ACM may be encountered in the following forms: Valves, vessels, piping insulation, insulation cement, mastic, floor and roof tiling, transit wall siding, caulking, and automobile brake linings.

Signs and labels shall identify the material which is present, its location, and appropriate work practices which, if followed, will ensure that asbestos containing material (ACM) and/or presumed asbestos containing material (PACM) will not be disturbed.

### III. Precautionary Measures & Safety Controls

Allied Universal employees are not to work on asbestos containing equipment or materials. If employees become aware of any potential exposure to asbestos, they are to immediately stop work and notify their supervisor/foreman. The supervisor/foreman is then responsible to inform the office for further information, but in no case allow work to proceed until the exposure to asbestos has been abated.

If employees working immediately adjacent to a Class I asbestos job are exposed to asbestos due to the inadequate containment of such job, their employer shall either remove the employees from the area until the enclosure breach is repaired or perform an initial exposure assessment.

All removal of ACM by a host client or their contractor must be done by certified people who are licensed to remove asbestos. No AU employee is permitted to work in any environment where ACM has been disturbed until host client has provided written verification that air testing in these areas are within permissible limits.

OSHA requires that to that extent feasible, engineering and work practice controls must be used to reduce employee exposure to Asbestos to within the PEL. Respirators may be used where engineering controls have been instituted but are insufficient to reduce exposure to the required level. Employers must establish and implement a written program to reduce employee exposure to or below the PEL by means of engineering and work practice controls and by the use of respirators.

OSHA also requires that a written asbestos safety program be available upon request to the Assistant Secretary for the Occupational Safety and Health Administration (OSHA), the Director of the National Institute for Occupational Safety and Health (NIOSH), employees and employee representatives. These plans must be reviewed and updated as necessary to reflect significant changes in the compliance program. Employee rotation cannot be used as a means to compliance with the permissible exposure limit.

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### IV. Employee Training

At sites where AU employees have or will have potential exposure to ACM or potentially asbestos containing material (PACM) during their work activities, all affected employees will complete asbestos awareness training. The training program will inform employees of the following:

- The characteristics, possible sources, and hazards of ACM and PACM
- Review of the Job Safety Analysis to understand the sources, locations and safety precaution specific to their job duties related to potential exposure to ACM/PACM
- Proper signage and detection methods to identify the presence of asbestos
- Symptoms of asbestos exposure
- Site-specific procedures related to asbestos, including how to notify supervisors of concerns related to asbestos exposure, questions, etc.
- The contents of this guidance document

Site specific training will be provided/conducted by the site supervisor. AU must rely heavily on client management for assistance in hazard identification and training resources. The branch manager is ultimately responsible for initiating contact with the client's management team when/if maintenance or construction activities will take place on site which may disrupt existing asbestos or introduce new sources of asbestos in the work area of AU employees

Documentation of employee training, which will include the training date and names of trainees and trainer, shall be retained for at least five years.

### V. Definitions:

*Class I asbestos work* means activities involving the removal of TSI and surfacing Asbestos-containing material (ACM) and presumed asbestos containing material (PACM).

*Class II asbestos work* means activities involving the removal of ACM which is not thermal system insulation or surfacing material. This includes, but is not limited to, the removal of asbestos-containing wallboard, floor tile and sheeting, roofing and siding shingles, and construction mastics.

*Class III asbestos work* means repair and maintenance operations, where "ACM", including TSI and surfacing ACM and PACM, is likely to be disturbed.

*Class IV asbestos work* means maintenance and custodial activities during which employees contact but do not disturb ACM or PACM and activities to clean up dust, waste and debris resulting from Class I, II, and III activities.

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### Appendix 21.11 Lead

#### **PURPOSE**

The purpose of this document is to inform personnel of the dangers of Lead and those precautions which are needed to protect employees from injury or illness by preventing exposure the lead.

#### **SCOPE**

The scope of this document includes hazard identification, information about the hazards of Lead and precautionary measures to protect employees from associated hazards.

This document applies only to sites where a potential for work-related exposure to Lead exists.

#### **RESPONSIBILITIES**

At sites where a potential for work-related exposure to lead exists, **Managers** will:

- Evaluate the workplace for potential exposure to lead, in routine and non-routine tasks, including site maintenance/construction activities and emergency situations.
- Document all potential for exposure to lead and safety precautions on the post-specific Job Safety Analysis. Work with the host client to assess potential lead exposure sources.
- **Modify job duties to move employees to a safe area/distance from potential exposure to friable asbestos, and provide appropriate personal protective equipment free of cost to employees.**
- Provide training on Hazard Communication, emergency procedures related to lead, and personal protective equipment.

At sites where a potential for work-related exposure to lead exists, **Employees** will:

- Take part in the JSA process to evaluate the workplace for hazards and understand and follow the expectations for each job task.
- Complete training required for the post.
- Notify their manager if replacement PPE is needed, or raise safety concerns related to lead.

**Corporate Risk Management** will provide ongoing support and information about lead to managers and employees, and maintain this awareness document.

- I. **Information about Lead & Health Hazards**
- II. **Hazard Identification & Potential for Exposure**
- III. **Precautionary Measures & Safety Controls**
- IV. **Employee Training**



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### I. Information about Lead & Health Hazards

Pure lead (Pb) is a heavy metal and is a basic chemical element. It can combine with various other substances to form numerous lead compounds. Numerous sources of lead in the workplace can include:

- Old glossy paints used on walls and pipe
- Electronic components, such as circuit boards and cathode ray tubes
- Demolition/ salvage materials, building and roof metal support frames
- Leaded glass

Lead can be absorbed into your body by inhalation (breathing) and ingestion (eating), but is not absorbed through your skin. When lead is scattered in the air as a dust, fume or mist it can be inhaled and absorbed through your lungs and upper respiratory tract. Inhalation of airborne lead is generally the most important source of occupational lead absorption. You can also absorb lead through your digestive system if lead gets into your mouth and is swallowed. If you handle food, cigarettes, chewing tobacco, or make-up, which have lead on them or handle them with hands contaminated with lead, this will contribute to ingestion.

A significant portion of the lead that you inhale or ingest gets into your blood stream. Once in your blood system, lead is circulated throughout your body and stored in various organs and body tissues. Some of this lead is quickly filtered out of your body and excreted, but some remains in the blood and other tissues. As exposure to lead continues, the amount stored in your body will increase if you are absorbing more lead than your body is excreting. Even though you may not be aware of any immediate symptoms of disease, this lead stored in your tissues can be slowly causing irreversible damage, first to individual cells, then to your organs and whole body systems.

Although very unusual, it is possible for a large short-term dose of lead to cause seizures, coma, and death from cardiorespiratory arrest. A short-term dose of lead can lead to acute encephalopathy. Short-term occupational exposures of this magnitude are highly unusual, but not impossible.

Long-term, chronic overexposure to lead may result in severe damage to your blood-forming, nervous, urinary and the reproductive systems of both men and women. Some common symptoms of chronic overexposure include loss of appetite, metallic taste in the mouth, anxiety, constipation, nausea, pallor, excessive tiredness, weakness, insomnia, headache, nervous irritability, muscle and joint pain or soreness, fine tremors, numbness, dizziness, hyperactivity and colic which can cause severe abdominal pain. Chronic overexposure to lead also results in kidney disease with few, if any, symptoms appearing until extensive and most likely permanent kidney damage has occurred.

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### II. Hazard Identification & Potential for Exposure

When AU management is informed by the host client of lead hazards in the workplace, all affected Job Safety Analysis (JSA) documents will be updated to reflect this new hazard. Updated JSAs will be reviewed and made available to employees per the JSA policy.

Employees must abide by any signs/labels/assessment reports indicating the presence of lead containing materials. Appropriate work practices must be followed to ensure the lead containing materials are not disturbed.

### III. Precautionary Measures & Safety Controls

Allied Universal employees are not permitted to work in areas where there is a potential for lead exposure. The AU manager is responsible to address lead and other safety concerns with the host client where construction activities take place in or near the work area of AU employees. Allied Universal will implement measures to remove employees from areas where lead exposures are confirmed or likely to prevent workplace exposures.

Employees must abide by any signs/labels/assessment reports indicating the presence of lead containing materials. Appropriate work practices must be followed to ensure the lead containing materials are not disturbed.

Employees' hands and faces should be washed if lead containing materials are contacted.

If AU employees work immediately adjacent to a lead abatement activity, the AU manager will work with the host client to verify that adequate containment measures are in place and maintained. Where the containment measures cannot be verified as adequate or are not maintained, the AU manager is responsible to remove AU employees from the area until the enclosure breach is repaired or a satisfactory exposure assessment is performed.

### IV. Employee Training

At sites where AU employees have a potential exposure to lead during their work activities, all affected employees will complete lead awareness training. The training program will inform employees of the following:

- Specific hazards associated with their work environment,
- Protective measures which can be taken, including signage and hygiene,
- Danger of lead to their bodies (including their reproductive systems),
- Their rights under OSHAs Lead Standard, 1910.1025, and
- The contents of this guidance document and site-specific procedures.

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Lead awareness training is required for employees whose work activities may contact lead containing materials but do not disturb the material during their work activities. Lead awareness training is required at time of hire, during orientation, or before assignment to areas containing lead. Refresher training must be given annually.

Site specific training will be provided/conducted by the site supervisor. AU must rely heavily on client management for assistance in hazard identification and training resources.

Documentation of employee training, which will include the training date and names of trainees and trainer, shall be retained for at least five years.