1.0 Policy

Processes and systems shall be established and designed to control hazards and eliminate the possibility of work-related injuries and illness.

2.0 Purpose

To define systems and methods for identifying, controlling and communicating existing or potential hazards.

3.0 Scope

Applies to all ACCO Engineered Systems work sites.

4.0 Definitions

Job Safety Analysis (a.k.a. - JSA) – means a systematic process of studying a 'job' (task) so as to define the activities associated with the job, identify the hazards or potential accidents associated with each sequential activity, and to implement controls that shall eliminate, nullify, or prevent such hazards from causing harm.

5.0 Requirements

5.1 Training

5.1.1 General

On an annual basis, the Safety Manager shall establish a training calendar. Each policy section of this manual will indicate training requirements.

Training methods will vary based upon need, local requirements, regulatory requirements, client requirements, and availability of instruction tools and materials.

Acceptable methods of training include verbal instruction, classroom lectures, use of video presentations, hands-on, computer-based and/or Internet-based interactive training.

Training may be modularized according to participant knowledge, scope of work, and work assignments of the individual, and applicable regulatory requirements specific to the work to be performed.

Pre and post testing for most types of training is preferred to determine the level of knowledge of new employees, existing employees, and re-hired employees. All training activities shall be appropriately documented and retained.

5.1.2 New Employee Orientation

All new hires shall receive a minimum of four hours of dedicated safety training (orientation) on the ACCO Engineered Systems safety policies and procedures.

This orientation shall include all applicable safety information and materials relevant to that employee's foreseeable duties and exposures.

If this orientation cannot occur before initiating work activities, the employee shall receive a site-specific orientation (see 5.1.3 of this Policy section) before commencing work activities. A complete orientation shall then be completed within thirty (30) days of employment.

Post testing is required to verify the comprehension of information and materials presented.

5.1.3 Site-specific Orientation

This orientation is conducted in addition to an initial safety orientation with persons upon their initial assignment based upon site-specific requirements. This orientation shall include site requirements, client requirements and other standards which are you unique to specific work sites.

5.1.4 Weekly Safety Training Meetings (Tool-box Talks)

On a weekly basis, employees shall meet at their work site(s) to review a specific safety subject relevant to current work site exposures, recent incidents, lessons, learned, and weekly company safety topics. Documentation of this process shall be obtained and retained (reference Appendix 9-D).

This process applies to the following work sites:

- Construction work sites
- Site-based maintenance
- Cleaning Service work sites
- Shops

Service employees shall meet on a monthly basis–at minimum–to review a safety subject relevant to current work site exposures.

5.2 Job Safety Analysis (JSA)

Each worksite shall develop JSA's to perform based on the following priorities:

- Past accident frequency
- Past accident severity
- Potential injury severity
- Newly established tasks

JSA's shall be developed using a standardized format. A sample form is included under Appendix 9-A1 (Job Safety Analysis Worksheet) JSA's shall be reviewed on an annual basis by the Safety Manager(s) and shall be retained at the originating work site as long as the task is performed.

JSA's shall be coordinated, at a minimum, by designated safety coordinator (Site or Business Unit), but include affected employees.

JSA's can be conducted for all of the following:

- Before the commencement of a new work site
- Weekly, at the beginning of work

- Daily, for any employee, before the commencement of any new task
- Any non-routine task

5.3 Inspections

Each policy section of this manual will indicate inspection requirements.

Safety Manager or designee shall establish an inspection process for all work sites (also including shops, warehouses and offices). As an addendum to this manual section, the specific inspection process and method of documentation shall be established.

All inspection activities shall be appropriately documented and retained (reference facility self-inspection form, Appendix 9-C1; construction / jobsite safety checklist, Appendix 9-C1.2; job site-specific safety audit form, Appendix 9-C1.3)

5.4 Safety Committees

5.4.1 Employee/Management Safety Committee

5.4.2.1 General

- All Committees shall be comprised of an employee and a management representative of all location work groups/areas.
- All Committees shall designate a chairperson.
- All meetings shall utilize a pre-developed agenda (reference Appendix 9-B).
- Committees shall meet, at a minimum, on a monthly basis.
- Minutes shall be developed for all committee meetings and the original(s) shall be kept as part of the permanent records. (reference Appendix 9-D)
- All Safety Committee representatives shall serve on the committee for a minimum of 1 year.

5.4.2.2 Activities

While varied according to local needs, Committee activities should include the following activities:

- Accident investigation review and analysis
- Workplace inspection review to detect unsafe conditions, practices and at risk behaviors
- Safety training activity review
- Safety recognition program review
- Safety goal status review
- Recommendations for Policy enforcement actions
- Recommendations for location safety policy Addendum for approval by management

5.5 Safety Violations

Establish disciplinary processes for safety violations and include as Addendum to this policy section.

5.6 Recordkeeping

Written records of all safety processes outlined in this policy section, including addenda shall be permanently maintained and retained by the Safety Manager.

Written records at remote work sites shall be maintained and retained by the senior ACCO Engineered Systems employee or designee at the remote work site. If/when the remote work site activities cease, these records shall either be forwarded to the Safety Manager or retained with work site files.

6.0 References

OSHA 3071
OSHA 29 CFR 1910.132 (d)(2)