Bryan Evans

bryanevans@hsetechnology.com

Abstract

The OSHA Accident / Incident Investigation and Reporting standards (29 CFR 1904) establish uniform requirements for EHS supervision and their role in providing inspections, internal communications, and employee training.

GUIDANCE FOR SAFETY AND ENVIRONMENTAL SUPERVISION, INSPECTION, COMMUNICATION AND TRAINING

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**A. GENERAL POLICY**

1. The Company’s Management is responsible for the supervision and training of all employees. They are responsible for communicating potential health hazards to employees and Contractors, and for inspecting the Company’s locations and work sites to ensure a safe working environment.

**B. SUPERVISION**

1. It is the responsibility of the HSE Department and the Company’s Safety Supervisor’s and Manager’s to make the offices and work sites safe. The Company's HSE Program has a system of checks to make sure hazard controls are working properly. This HSE Manual has guidelines for inspections that will aid in maintaining a safe working environment for all personnel.
2. The Company encourages its employees to let other employees of the organization know when they see things that look harmful.
3. Supervisors should know how to perform investigations when things go wrong and when someone gets sick or hurt. Supervisors should also know how to correct such problems.
4. Safe working procedures, based on the analysis of hazards to personnel, should be used at all times. Supervisors should be ready to enforce rules for safe work and set-up disciplinary actions for those who do not follow these procedures. Supervisors should also acknowledge and encourage those who demonstrate good, safe work practices on a regular basis.
5. Supervisors should assure regular maintenance is performed on all equipment so accidents may be avoided.
6. All relevant records will be kept on file with the Company’s written HSE Program Handbook and will be made available to inspecting governmental agencies. Employees and their designee are provided, by law, the right to review their medical records.

**C. INSPECTIONS**

1. The most widely accepted way to identify hazards is to conduct Health and Safety audits and Inspections. The Company is responsible for developing self-inspection procedures and checklists necessary to identify and correct potential hazards or unsafe practices.
2. These inspections will also be used to evaluate and assess the effectiveness of the Company’s HSE Manual and the Company’s overall HSE Program or SMS Safety Management System.
3. Safety and health inspections will be conducted at each of the Company’s locations. The HSE Department along with key management and Supervisors will perform these audit/ inspection. Personnel should be asked for input or suggestions on how their work site can be made safer. Documentation and results of each inspection will be kept on file by the HSE Department.
4. Any deficiencies or areas of non-compliance should be corrected as soon as possible, and the HSE Manualrevised, if necessary.

**D. COMMUNICATION**

1. Communication between management and personnel is imperative with regard to safety and health issues. It is the Company's responsibility to communicate potential hazards of the work site to employees and, it is the employees’ responsibility to communicate the occurrence of avoidable hazards and hazardous situations to management without fear of repercussion.
2. OSHA work site posters should be displayed in prominent locations where all persons will see them. Emergency phone numbers should be posted near telephones. In areas that require the posting of warning signs, the signs should be placed where all employees, Contractors and other personnel can easily see them.
3. Safety meetings should be planned well in advance for each of the Company’s locations. The HSE Department or a member of the Company’s Management Team or their designee is responsible for the development of safety meetings and training sessions. Each meeting should cover a different safety topic or issue pertinent to the work in that particular location. Safety videos are to be utilized and outside speakers may be brought in to give lectures or demonstrations on selected topics. Employees themselves may be asked to give lectures on selected issues.

**E. TRAINING**

1. Employee rosters and work assignments change constantly; therefore Management should not assume that an employee has received safety training on a specific topic. Each employee's personnel file should include a copy of the attendance record for each course, training certificates and tests as well as the HSE Departments Training Matrix.
2. The objectives of the Company’s training are presented in the Section titled - *“Safety Training”* of this HSE Manual. Specific training requirements are also addressed in each of the appropriate sections of this HSE Manual.
3. As a general rule, no one is expected to undertake a job or task until they have received instructions on how to properly perform the job or task, and have been authorized to perform that job or task. Similarly, no one should undertake a job or task that appears unsafe.
4. Every Company employee has the Management backed and enforced “ RIGHT TO STOP THE JOB IF HE OR SHE FEELS IT IS NOT SAFE, DOES NOT UNDERSTAND THE JOB TO BE DONE OR HAS NOT RECEIVED THE PROPER TRAINING TO COMPLETE THE SPECIFIED JOB SAFELY”.

**F. RECORDS RETENTION**

1. Medical and exposure records for potentially chronic effects of toxic substances will be kept for the duration of employment plus an additional 30-years. An employee or designee shall have access to examine or copy relative medical and exposure records regardless if the records relate to specific OSHA standards.
2. Medical records include:
3. Medical and employment questionnaires or histories;
4. Results of medical examinations and laboratory tests;
5. Medical opinions, diagnosis and recommendations; and
6. Employee medical complaints.
7. Exposure records include:
8. Environmental monitoring, measurements and related information;
9. Biological monitoring results;
10. MSDS; and
11. Other records revealing the identity of a toxic substance or harmful physical agent.
12. Employee medical records do not include:
13. Physical specimens that are routinely discarded;
14. Records concerning health insurance claims; and
15. Records concerning voluntary “Employee Assistance Programs” (alcohol, drug abuse or personal counseling).

**G. SUBSTANCE ABUSE**

1. All Company employees will strictly adhere to the Company’s policies regarding the abuse of alcohol, drugs or firearms and/or explosive devices. Appropriate disciplinary action, up to and including termination of employment, will result for willful violation of the Company’s substance abuse policies.