

# **Barrett Business Services Inc.**

**Health and Safety Program** 

<u>Or</u>

**Injury and Illness Prevention Program** 

Barrett Business Services Inc. 3401 Centre Lake Drive Ontario, CA 91761

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#### **BBSI**

## Safety and Health Policy Statement

It is our policy that every employee and all property is entitled to maximum protection from controllable hazards. BBSI is committed to safety, health and loss control and each employee shall work under safe and healthy conditions. BBSI will strive to provide a safe workplace that is free from recognized hazards. We will work with our customers to provide our employees with information, training, supervision, and personal protective equipment so that they can safely perform their job.

BBSI believes most accidents can be avoided by applying common sense and personal initiative. We also believe employees must not perform any task that they believe is unsafe. Many accidents occur when employees take short cuts and ignore established safety rules and regulations. Therefore; **established safety rules and regulations are to be followed at all times.** 

BBSI strives to comply with all safety regulations implemented by federal, state, and local agencies. This Health and Safety Program or Injury Illness Prevention Program (IIPP) sets forth safety and health rules and procedures to be followed by all employees. While the IIPP helps one to recognize and avoid obvious health and safety hazards, it cannot cover all situations. When in doubt concerning a health and safety issue, one should consult with your supervisor for guidance.

Working together we will achieve the goal of a safe and healthy work environment for ourselves and our co-workers. Each employee shall be responsible for their performance and adherence to our safety rules. Failure to do so will lead to progressive disciplinary actions, up to and including termination of employment. Health and Safety is not a series of individual activities towards a goal, but it is a reflection on how well we look out for our co-workers and ourselves.

Signature on file at BBSI Office.	/3401 Centrelake Drive, Ontario, CA
John Klosinski/Area Manager	

# 1.0 Program Administration and Scope

BBSI is a temporary employment service engaged in providing skilled and unskilled personnel to customers on an "as needed" basis. This program shall apply to all BBSI employees, both temporary and staff members, and all employees will be expected to comply with the program elements. A copy of this IIPP Program shall be maintained in the BBSI Office and at BBSI Client locations where BBSI provides On-site Supervisors/Managers. It shall be made available to employees and/or regulatory personnel upon request.

# 1.1 Program Administrator

Mike Clark/Risk Management Consultant at the Ontario, CA BBSI office will be the designated administrator of the program and assume responsibility for compliance with the program elements.

## 1.2 Support Structures

Mike Clark/Risk Management Consultant will be supported in administration of the program by individuals within BBSI. These support individuals shall include, but are not limited to:

- John Klosinski/Area Manager
- Mike Clark/Risk Management Consultant
- Rosemary Abrego-Holmes/Human Resources Manager
- On-site Supervisors/Managers
- Charles Kellogg/Corporate Risk Director

#### 1.3 Definitions

In this Health and Safety Program/IIPP the following terms and definitions shall apply:

- **Primary Employer** shall refer to BBSI
- **Host/Secondary Employer** shall refer to the customers of BBSI that control the sites at which BBSI field employees work.
- **Field Employee(s)** shall refer to temporary employees of BBSI, including skilled and unskilled personnel.
- **BBSI Staff Members** shall refer to full time employees involved in the daily administration of BBSI business functions.

# 2.0 Program Responsibilities

The success of this IIPP will depend upon the compliance and cooperation of all parties in the business process.

#### **2.1 BBSI**

As the primary employer, BBSI shall provide a safe and healthy workplace. Employees will be provided with general safety training/orientation. Selected articles of Personal Protective Equipment (PPE) will be provided as required by the Host Employer unless otherwise stipulated in the work order. The specifics of the training and PPE programs are discussed in section five (5) of this program.

#### 2.2 Customers of BBSI

The customers of BBSI, as the host employer, will be responsible for the maintenance of a safe and healthy work site. Customers will be expected to adhere to the provisions of the work order and assign BBSI employees only to those jobs that were agreed to during the order and dispatch process. Site specific training and PPE required, (as determined by the customer) will be the responsibility of the customer.

BBSI does not supervise work at the job site (except for Vendor on Premises (VOP) locations). Consequently, customers are responsible for supervision of BBSI field employees at the job site. Customers shall only delegate duties to BBSI field employees that are within the scope of the original work order. Any assignment must be consistent with the skills and abilities of the assigned BBSI field employees as determined by BBSI. Customers shall not require BBSI employees to perform any work that requires or involves activity that violates state, federal, or local regulations. Customers shall not direct any BBSI field employee to drive a vehicle or to operate equipment or machinery unless a BBSI branch staff member has been notified and gives approval in writing. In cases where the customer has a safety program, the customer will be expected to ensure that BBSI employees comply with the health and safety aspects of that program.

## 2.3 BBSI Field Employees

BBSI's Safety and Health Program (IIPP) applies to all field employees hired by BBSI and at all BBSI facilities. All field employees of BBSI are responsible for working safely and maintaining a safe and healthful work environment. Field employees will be expected to use good judgement along with their expertise and experience to prevent injuries and accidents. Training shall be provided to field employees along with other safety and health information. Field employees will participate in safety training and safety information programs and will be encouraged to ask questions relating to health and safety in order to assure proper understanding. Field employees are required to immediately report all work-related injuries, accidents, unsafe conditions, unsafe practices and "near miss" events to BBSI and the site supervisor.

# 3.0 Communication

A consistent flow of accurate information between BBSI, customers, and field employees will help to provide a solid foundation for a safe and healthy workplace.

## 3.1 Field Employees

Field employees shall be required to attend an orientation training session before conducting work and encouraged to participate in safety training programs, safety meetings, and other types of safety communication programs. All these programs shall be documented by topic, date and signature of employee. Employees shall not be discriminated against in any way for communicating health and safety concerns to BBSI.

#### 3.1.1 Supervisory Meetings

All supervisors shall meet telephonically on a bi-weekly basis. These meetings conducted and facilitated by the IIPP Administrator, shall provide on-going training in the Safety and Health Program, and provide a forum for supervisors to discuss health and safety related issues. The program administrator shall attend these meetings and documentation (minutes of the meeting, topics covered and attendees) of the meetings shall be kept. Guests from other BBSI departments, consultants, insurance company personnel and others are encouraged to attend.

#### 3.1.2 Safety Talks and/or Safety Meetings

Employees shall be required to comply with the provisions of the Health and Safety Program. This may include on site safety talks and/or safety meetings as required in the construction safety orders found in the California Code of Regulation Title 8. When BBSI Branch Staff Members are at the site, they shall, to the extent practical, make personal safety contacts with the field employees working at the site.

## 3.1.3 Health and Safety Teams

BBSI Ontario shall have a Health and Safety Team. The team shall consist of a mix of management and hourly branch staff employees. Temporary employees will be allowed to participate as team members or guests at meetings when practical. Mike Clark/Risk Management Consultant shall be the team facilitator. The team shall meet bi-weekly and shall discuss health and safety related items including but not limited to:

- Accidents and Incidents involving BBSI employees (including near miss incidents).
- Regulatory issues (new regulations, initiatives, etc.)
- Reports from internal safety audits
- Suggestions, concerns, or complaints from field employees
- Follow up on recommendations from previous meetings
- Additional or changes in health and safety regulations
- Corporate health and safety concerns
- Critical Decision after Reconsideration from the Standards Board

The team shall make recommendations to the BBSI Staffing Group relating to the items discussed. Minutes of the meetings shall be documented, and the documentation shall be made available to field employees either by posting at the branch office or by some other appropriate method.

#### 3.2 Customers

For BBSI to supply workers suited to the customers needs, the customer must provide accurate information related to the requirement and hazards of the work at the site. BBSI service representatives shall conduct a telephonic

screening of the prospective customer during the work order process. Customers will be required to provide such information as:

- Whether or not the customer has a Health and Safety Program (IIPP)
- Whether or not the customer has done hazard analysis of the proposed work
- Whether or not the customer will provide site-specific training and /or task-specific training to the field employees at the site including the specific type of training.
- Whether or not the customer will provide the site-specific PPE and associated training including the specific PPE and training.
- Information relating to the nature of the work (i.e. office/professional, light industrial, etc.)
- Whether or not the customer provides on-site First Aid and provisions for emergency transportation of injured workers.
- Whether or not the customer can provide a Cal/OSHA 300 Log

The results of the telephone screening will be documented either in the customer database, on paper forms, or a combination. The documentation will be retained in accordance with the record keeping section of this program.

BBSI will visit customer sites within 24 hours if:

- BBSI field employees will be involved in elevated work over six feet from ground or floor level.
- If more than ten BBSI field employees are working at the same location.
- BBSI field employees will be involved in Confined Space Entry.
- Punch Presses and other equipment with limited guarding
- Trenches or excavations greater than 5 feet
- Working on live electrical

This may take the form of a facility tour during sales calls or a walk-through tour of the area with the field employees before the start of work at the site. A "Safety Checklist" will be completed by the BBSI Staffing Risk Management Consultant during these visits and the form (Appendix 1) will be retained in the files in accordance with Section 9 of this program. The Staffing Risk Management Consultant will decide whether a site visit is necessary prior to the start of the work based on the information gathered during the telephone screening, experience with the customer or type of work, or other criteria established by the Corporate Risk Management Department. The Corporate Risk Management will provide technical assistance to Branch Staff relating to these site evaluations.

The information gathered during the telephone screening and subsequent evaluations (if required) will help BBSI choose the appropriately skilled employees and provide the proper general and specific training and 1 PPE associated with the job and its safety requirements.

## 3.3 Discipline Program

BBSI's safety rules and policies shall be enforced through periodic job site inspections and independent field and management employee evaluations, which may include input from customers. Violation of safety policies shall be recorded in accordance with the guidelines provided by the Branch Human Resources Department and the field employees shall be disciplined in a manner commensurate to the circumstances, nature, and severity of the violation. The intent is to stop behavior that could lead to an accident and/or injury of BBSI employees or others or lead to the loss of or damage to BBSI or customer property. Discipline may include, but not be limited to, documented oral warnings, written reprimands, unpaid suspension, and termination of employment.

BBSI reserves the right to terminate a worker for gross negligence or willful misconduct that leads to an accident or incident that endangers the health and/or safety of him/her or others, or to the loss of or damage to property.

All violations shall be thoroughly investigated and documented, including date of safety rules/policies violation and discipline enacted. Copies of documentation shall be provided to the persons involved as directed by the Branch Human Resources Department.

# 4.0 Hazard Assessment and Correction

Identification, assessment, and correction of hazardous conditions and/or practices is an integral part of this program. Each BBSI employee is encouraged to be alert to and appropriately react to any hazard potentially impacting their health or safety.

#### 4.1 Work Order Hazard Assessment

BBSI service personnel shall conduct a telephone evaluation of a potential customer during the job order process. This evaluation shall include the information mentioned in Section 3.2.

Field employees will not be dispatched to a customer site unless the BBSI Risk Management Consultant is confident that the site is safe. Much of the information included in the telephone evaluation will be recorded on the "New Client Implementation Worksheet" A paper form "BBSI Worksite Evaluation" shall be completed and retained in the branch office.

#### 4.2 Site Evaluation

When the telephone evaluation mentioned in Section 4.1 reveals a need to further evaluate the customer and /or site, BBSI branch staff or their designated agent, shall visit the site prior to dispatching field employees. An evaluation of the site conditions and customer policies relating to health and safety shall be a part of this visit. Any hazards observed by BBSI employees or agents during these visits must be addressed by the potential customer in such a way as to assure BBSI that field employees will not be exposed to an unacceptable hazard. BBSI is not responsible for job site conditions; therefore customers must maintain the job site in a safe and hazard-free condition in compliance with applicable occupational safety and health standards and must provide required site-specific training. Customers shall ensure that all duties assigned to BBSI field employees by a job site supervisor are performed in compliance with applicable occupational safety and health standards. Customers shall ensure that all safety equipment is in good working condition and that it is utilized by trained workers with the equipment when required. Branch staff from BBSI or their designated agents, shall periodically visit work sites and shall evaluate the sites by communication with field managers, field employees, physical observations, and customer interviews. Workplace hazards reported to BBSI shall be investigated and employees will be instructed not to work in any area or on any job, which poses a significant potential threat to their health and safety. If an employee feels that his/her health and/or safety is threatened by a condition, practice, or lack of training; the employee is to call BBSI management immediately.

If a telephone evaluation or site visit reveals a potential exposure to a hazardous substance, such as asbestos, field workers shall not be allowed to work in the area without authorization from the Corporate Risk Management Department. Other examples of hazardous substances would include, but are not limited to:

Lead Mercury
Vinyl Chloride Formaldehyde

Hazardous substances in the State of California include substances listed in T8 CCR 5155 Appendix AC-3.

# 4.3 Personal Protective Equipment

BBSI will work with customers to assure that field employees are provided with required Personal Protective Equipment (PPE). Common PPE items such as:

- OSHA-approved hard hats
- Work gloves
- Ear plugs
- Safety glasses
- Dust masks

may be provided by the branch staff or the customer at the site. Job specific PPE requirements will be established at dispatch and BBSI will inform field employees of these requirements. Where specialized PPE (i.e. respirators, fall harnesses, etc.) are required; the customer will supply these items along with the associated training relating to their proper use unless otherwise stipulated in the work order.

# 5.0 Training and Instruction

Training and instruction of employees shall begin with the orientation process and shall be on-going during their employment with BBSI. Training shall be provided by both BBSI and our customers, and all training will be documented with the date, the signature of the participants and instructor, and statement describing the subject(s) taught. Training documents will be held on site and then transferred to corporate. All training documents must be kept for 30 years after the worker has left the company T8 CCR 3204

## 5.1 New Employee Orientation

New employees will be given an orientation that shall include health and safety training. The subjects shall be presented in a variety of formats (video, lecture, etc.) and employees shall be required to complete an examination or answer verbal questions relating to the material covered during the orientation. BBSI branch staff shall review any written examinations and any missed questions shall be reviewed with the employee to assure understanding. Subjects covered in the general safety training during orientation shall include at least the following:

#### For Office/Professional Assignments:

Evacuation Hazard Communication

Fire Safety Personal Protective Equipment

Injury/Incident Reporting Bloodborne Pathogens

#### For Industrial Assignments (including warehouse/distribution):

Slips, Trips and Falls Hazard Communication

Evacuation Fire Safety

Back Safety Lock Out/Tag Out

Personal Protective Equipment Injury/Incident Reporting Bloodborne Pathogens Heat Illness Prevention

Employee qualifications shall be evaluated during the application and orientation process. Employees who possess certifications (i.e. electrician, journeyman status, etc.) shall be considered to have the knowledge necessary to have achieved the certification or industry status. Any written examinations given by BBSI branch staff shall be reviewed and questions that are answered incorrectly shall be reviewed with the employee prior to the employee being placed on a job assignment.

## 5.2 Management and Staff Training

BBSI management and staff personnel shall be trained periodically, and this training shall include aspects of job safety. Any time this program is revised all employees including management, field, and branch staff employees shall be trained regarding the revisions.

# 5.3 Site Specific Training by Host Employer

Host employers have the best knowledge of site-specific processes and conditions. It is therefore more practical for the host employer to conduct site/task specific training with BBSI field employees. Field employees shall be instructed to expect this training and shall also be instructed to inform BBSI immediately if the training is not given at the site. If site/task specific PPE is required (i.e. respirators), the host employer will be required to provide the PPE and the associated training unless contractual arrangements have been made in advance with BBSI. Field employees will be directed to contact the BBSI branch staff immediately if they feel that their Health and/or Safety is endangered due to a lack of training associated with the assignment given by BBSI at dispatch. BBSI branch staff will conduct periodic follow-ups to assure that employees are receiving the required training at the site.

#### **5.4 Powered Industrial Trucks**

Since Cal/OSHA does not recognize "3<sup>rd</sup> party certifications" for forklifts and other powered industrial trucks it is impossible for BBSI to provide "Certified Forklift Operators" to host employers. BBSI recruiters can screen perspective operators in regard to past experience which may be demonstrated by certifications issued by former employers. After BBSI has dispatched "qualified" operators to a host site it is incumbent on the host employer to certify the operators following their own certification program which must comply with Cal/OSHA requirements (Subchapter 7, General Industry Safety Orders, Group 4, General Mobile Equipment and Auxiliaries, Article 25, Industrial Trucks, Tractors, Haulage Vehicles and Earth Moving Equipment)

3668. Powered Industrial Truck Operator Training.

- (a) Safe Operation.
- (1) The employer shall ensure that each powered industrial truck operator is competent to operate a powered industrial truck safely, as demonstrated by the successful completion of the training and evaluation specified in this section.
- (2) Prior to permitting an employee to operate a powered industrial truck (except for training purposes), the employer shall ensure that each operator has successfully completed the training required by this section, except as permitted in subsection (e).

(See appendix 1 for entire rule)

# **6.0** Accident/Incident Investigation

BBSI service personnel have a prominent role in conducting accident investigations. The responsibility for conducting an accident investigation includes collecting the facts, determining the sequence of events that resulted in the accident, identifying causes, recommending action to prevent recurrence, and providing follow-up to ensure that corrective action was effective.

The purpose of an investigation is to find the cause of an accident and prevent further occurrences, not to fix the blame. An unbiased approach is necessary to obtain objective findings.

Promptness of the investigation is essential since conditions at the accident scene will change. A delay of only a few hours may permit important evidence to be destroyed or removed, intentionally or unintentionally. Moreover, witnesses are more likely to relate circumstances as they were, without the added conjecture that comes later from

discussions of the accident with others. The type of investigation depends on the nature and magnitude of the accident. Visit the accident scene as soon as possible, while facts are fresh and before witnesses forget important details. If the injury resulted in a serious injury or death of an employee, the Risk Management Consultant/ Mike Clark, shall immediately contact the Area Manager/John Klosinski and Corporate Risk Management and proceed as directed in conducting a site investigation. For a serious accident or fatality we must call Cal OSHA within 8 hours or sooner. A serious accident is defined as an accident where an injured party is admitted to a hospital or any amputation.

If possible, interview the injured worker at the scene of the accident and "walk" him /her through a re-enactment. All interviews should be conducted as privately as possible. Interview witnesses one at a time. Talk with anyone who has knowledge of the accident, even if she/he did not actually witness it.

All accident reports involving personal injury and/or property damage must be submitted to the Workers Compensation Claims Department (Felipe Garcia, Hugo Martinez and Sandi Long), Staffing Risk Management Consultant/Mike Clark, Staffing HR Manager Rosemary Abrego-Holmes within 24 hours of the first notice to the supervisor.

The accident/incident investigation report shall contain at least the following information:

- Type of event the event that directly resulted in the injury, illness, or property damage.
- Causation Factors the objects, substances, or exposures which directly produced or inflicted the injury, illness, or property damage.
- Machine/equipment involved the object in which the agency existed. Include machine name, serial number or other identifier, and manufacture.
- Extent of injury/illness/damage the type of physical injury, illness, or property damage incurred.
- Part of body/object the part of the injured/ill person's body or object directly affected.
- Job/operation performed the physical condition and/or procedure (circumstance) which permitted the occurrence of the accident or near miss.

The forms for reporting of accident/injuries and near miss incidents are in the BBSI internal database which is accessible by all Managers and Supervisors.

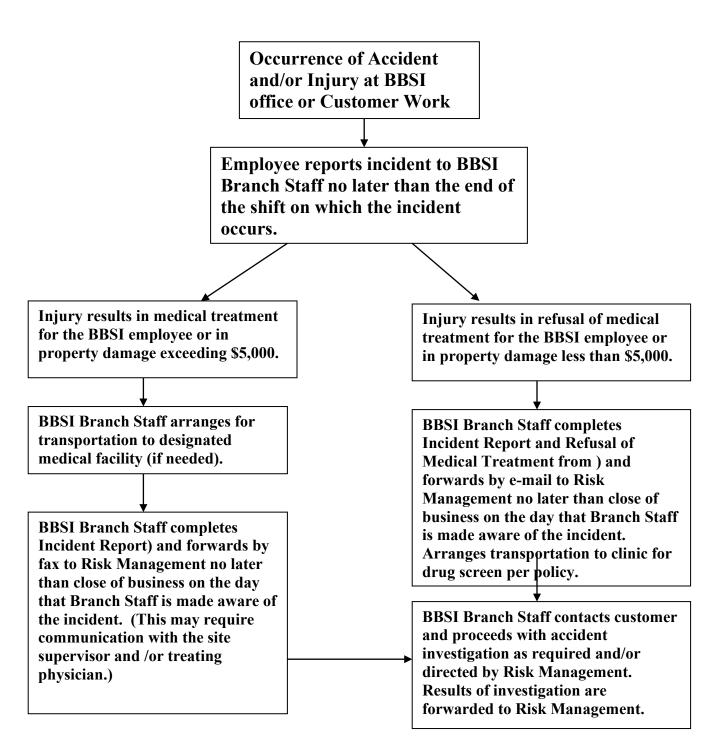
Supplementary information closely related to the key facts (such as the person's physical state, weather, time of day, etc.) should be recorded, so that all facts are available for determining the causal reasons for the accident and proper preventive steps can be implemented. Contributory factors should be indicated. Then, record those facts in a written summary to show general patterns of occurrence in as much detail as possible. The patterns identified are the areas, conditions, and circumstances to which accident prevention efforts must be directed. Complete data regarding all the key facts should be fully and accurately recorded at the time of the investigation.

The last and most important step in the accident investigation process is determining preventive/correction action to be taken. Decisions on such actions should be based upon the facts gathered and causes determined and approved by the Area Manager.

The investigator completing the report, with the help of site management, must make initial corrective action recommendations. The Risk Management Consultant/Mike Clark may make modifications to the corrective action recommendations, as well as additional corrective action recommendations.

BBSI branch staff involved in accident/incident investigations should contact the Corporate Risk Management Department for support and assistance if necessary.

## **Accident/Injury Communications Flowchart**



Note: Special Reporting Guidelines exist when an accident results in the hospitalization or death of an employee. In these cases, contact Corporate Risk Management Immediately for assistance!

# 7.0 Hazard Communication Program

In accordance with federal and state regulations, BBSI has established a Hazard Communication Program under T8 CCR 5194 intended to inform employees of the potential hazards associated with the substances that they could be exposed to in the workplace.

# 7.1 Hazardous Materials Inventory

T8 CCR 5194(b)(2) "This section applies to any hazardous chemical which is known to be present in the workplace in such a manner that employees may be exposed under normal conditions of use or in a reasonably foreseeable emergency resulting from workplace operations".

Each BBSI branch will conduct an inventory of all chemical substances used in the office. This will include substances used to maintain any company vehicles and equipment. Any material that qualifies as hazardous will be placed on an inventory list and this list will be maintained in the branch office. If a substance (chemical) has a SDS, then the material is hazardous and is in the list of chemicals. Some examples are:

- Toxic- such as insecticides
- Corrosive- such as battery acid or lye
- Flammable/Combustible Liquid- such as gasoline
- Reactive-such as Ammonia

Any questions concerning whether or not a substance should be placed on the hazardous materials inventory should be referred to the Risk Management Consultant/Mike Clark.

#### 7.2 Safety Data Sheets (SDS)

Safety Data Sheets will be maintained in the office for all hazardous materials on the inventory sheet. These sheets will be kept in a location where they will be available to all employees and regulatory personnel upon request. SDS may be obtained from the manufacturer or vendor of the product and in some cases are available over the Internet or by fax. SDS contains valuable information regarding safe use and storage of the substance and should be reviewed with all employees required to use the substance. All BBSI employees will be directed to review the manufacturer's label on "over the counter products" such as household cleaners before they are used in the office. When any new hazardous substance is introduced to the office, the SDS should be reviewed by the branch manager and any hazards communicated to the branch staff as soon as practical. Temporary employees at customer sites will be informed of the location of the SDS at the site.

## 7.3 Labeling

All containers of chemical substances must be labeled. Containers should be stored properly with the manufacturer labels intact. If a secondary container such as spray bottle is used, the secondary container must be labeled with at least the following information:

- The name of the substance,
- Any required hazard warning (such as "Poison")'

Employees will not be permitted to transfer substances into improper containers or containers with no labels.

## 7.4 Training

All BBSI employees will receive training in hazard communication as part of their standard orientation. The training will include an overview of the employees "right to know" concerning hazardous substances in the workplace, instruction on how to read SDS, and how to recognize chemical hazards. In addition to the orientation training, temporary employees assigned to customer work sites will be instructed to ask for hazard communication training at the site and to inform BBSI branch staff if the training is not received.

# **8.0 Heat Illness Prevention**

The protection of employees from heat related illness shall be accomplished by employee education and cooperation between BBSI and site supervisors in control of the work sites. BBSI will assure that the client site supervisor has as part of their Heat Illness Prevention programs the following-

- Access to water (hydration)
- Access to Shade
- Acclimatization of workers to changing environments
- Training of employees and supervisors related to heat illness
- Emergency response (including recognition of heat related illness)

Since BBSI does not control the sites, and sites may vary, employees will be instructed prior to any assignment that involves potential for heat illness exposure.

Instruction will include recognition of heat illness symptoms and heat illness countermeasures how to transport a heat illness victim to a hospital. This instruction will be part of the pre-assignment orientation.

# 9.0 Emergency Response

Emergency situations may arise at any time. BBSI offices will use this section of the program as a guideline in addition to the guidelines set forth by state and local authorities, to assist in such situations. Emergency situations may include:

- Weather related emergencies (i.e. Tornadoes),
- Workplace Violence,
- Fire,
- Earthquake,
- Injury or Illness.

BBSI Staff Members have been instructed to dial "8" for an outside line then "911" for emergencies.

#### 9.1 Evacuation and Shelter in Place Situations

In the event of an emergency that requires evacuation of the building, employees should be instructed to evacuate in an orderly manner. At least one evacuation leader and one alternate will be selected in each office. These leaders will assure that all employees in the office or job site are accounted for and that the evacuation is conducted in a safe and orderly manner. A line diagram showing the evacuation route will be posted in a conspicuous location in each office. All building exits must be clearly marked and kept unlocked while the building is occupied. Aisles leading to exits must be unobstructed. In cases where a "shelter in place" strategy is needed (i.e. a tornado), an area of the office or building will be designated for this purpose. This should be an area with no windows, and it should be located near the center of the building.

## 9.2 Emergency Supplies

The BBSI office will have basic emergency response equipment consisting of an ABC type fire extinguisher and a First Aid Kit. Emergency supplies will be checked during regular branch inspections and will be maintained in useable condition.

## 9.3 Training and Instruction

BBSI Branch staff will receive basic emergency response instructions during their orientation. These instructions will include:

- Location of building exits,
- Location of "shelter in place" rooms,
- Evacuation plans and procedures,
- Use of fire extinguishers,
- Any specific local requirements (i.e. earthquake procedures).

At least once each year, the Branch staff will have an emergency drill. This may be done in conjunction with local fire department building drills.

# 9.4 Workplace Violence

Workplace Violence is among the leading causes of fatal occupational injuries in the United States each year. BBSI does not tolerate violent behavior in the workplace. Employees will be instructed to report any act of violence or threat of violence in a BBSI office or customer's workplace. Any BBSI employee that engages in violent behavior at work will be subject to disciplinary action up to and including termination of employment. BBSI offers specialized training relating to workplace violence and this training is made available to branch staff members.

# 10.0 Record Keeping

Records of health and safety related activities shall be maintained by BBSI in accordance with Federal and State regulations. The records shall be kept for three (3) years except records related to health which must be kept for 30 years after employee separation from BBSI. OSHA 300 and other injury illness information shall be kept for five (5) years. The records kept by BBSI shall include at least the following:

- Injury and Illness Reports (30 years)
- Site Evaluation Forms
- Job Order Forms
- Employee Training records (class attendance, tests, etc. 30 years after employee separation for records related to health
- Employee Safety and Health Concerns (30 years)
- Reports of Health and Safety Team Meetings.

# 10.1 Regulations Specific to Cal/OSHA 300, 300A and 301 Logs

 BBSI (primary employer) has no obligation to maintain Cal/OSHA Logs for customers. It is a Cal/OSHA requirement, customers of staffing companies record all injuries on their premises on their Cal/OSHA 300, 300A and 301 Logs.

#### • Excerpt from Cal/OSHA Dual Employer Policy:

If not exempt from 8 CCR §14301, did the secondary employer enter on its Log 300 all recordable injuries and illnesses of employees supervised by the secondary employer, including employees of the primary employer?

NOTE: The primary employer is not required to log injuries and illnesses occurring at the secondary worksite unless the primary employer directs the activities of the employees on a day-to-day basis Any injury or illness should be recorded on the Log 300 only once, either by the secondary employer or by the primary employer, depending on which employer is supervising the employee on a day-to-day basis.

 During the first month of each calendar year BBSI will provide customers with the total number of hours worked by temporary employee the previous year for purposes of Cal/OSHA 300A calculations.

# 11.0 Program Evaluation

The effectiveness of this program can be affected by a number of factors. The work place of today is changing constantly and new technologies are being introduced. With this in mind, BBSI shall regularly review this **HEALTH AND SAFETY PROGRAM (IIPP)** to evaluate its effectiveness. These evaluations shall be done at least annually and shall consist of a review of at least the following factors:

• Accident/Injury/Illness history since the last review

- Implementation of the program
- Changes in regulations that affect the program
- Concerns of employees related to health and safety
- Changes in Technology that could improve health and safety in the field
- Review of any major accidents

The BBSI Management Team will facilitate the program evaluation process.

This program is effective January 1, 2015 and shall remain in effect until discontinued or revised by the BBSI Senior Management.

# Injury and Illness Prevention Program (IIPP) Addendum – EMPLOYEE ACCESSIBILITY

Name of Business: BBSI

Cal/OSHA requires that all employees have access to a copy of their employer's written IIPP. All our employees have access to the written IIPP through one of the following methods:

	provide access through our company server or website, which allows employees eview, print, or email a copy of the IIPP.
Ado	ditional information:
	on request, our business will provide employees with access to the IIPP by: (select option below)
$\boxtimes$	Providing a printed copy of the IIPP
	Providing an electronic copy of the IIPP
	employees can request access to a copy of the written IIPP by: (select one option below)
	Requesting a copy from their supervisor

Requesting a copy from Human Resources
Other: (describe below)

A copy of the IIPP will be provided within five (5) business days after receiving the request.