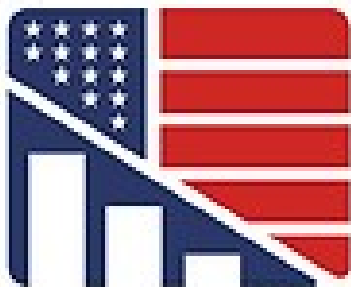

(Insert your Company Name Here)

Safety Audits and Inspections Plan

Provided By:



NATIONAL INDEPENDENT BUSINESS ALLIANCE

American Businesses...Stronger Together!

info@nibausa.com

1-844.252.1344

WWW.NIBAUSA.COM



NATIONAL INDEPENDENT BUSINESS ALLIANCE

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INTRODUCTION

This policy is designed to provide drivers, employees, and all other concerned parties with information regarding the policies and general practices of this company. Written information is provided herein. However, it is not the intent of the company to list all aspects of its programs, policies and or procedures within this policy. It is also understood that the information contained herein is subject to change at the discretion of the company. Additional policies and directives may be issued at any time.

It is the intent of this company to operate a Safe Workplace and in accordance with the regulations set forth by all applicable Regulatory Agencies. Nothing in this policy is designed to supersede these regulations.

All drivers are expected to operate drug-free, safely and courteously on the highways. Evidence that this requirement is not being honored will result in the immediate revocation of the safety clearance of the offending driver.

Safety Audits & Inspections

Purpose

Inspection of work areas and audits of safety programs are tools that can be used to identify problems and hazards before these conditions result in accidents or injuries. Audits also help to identify the effectiveness of safety program management and can be used as a guide to assure regulatory compliance and a safe workplace.

Responsibilities

Management

- Design and schedule audit and inspection procedures for all work areas, processes and procedures.
- Conduct routine audits and inspections
- Ensure audits are conducted by employees who understand the various safety programs and policies

Supervisors

- conduct informal daily safety inspections and ensure all unsafe conditions are corrected
- conduct documented weekly inspections and ensure all unsafe conditions are corrected

Corrections

All safety deficiencies found during audits and inspections should be corrected as soon as possible. Documentation of corrections should be made on the audit or inspection sheet. And conditions that present hazards are to be corrected or controlled immediately.

Types of Inspections

Supervisor & Management Daily Walk-through: this is an undocumented inspection that is made daily prior to startup and shift change to ensure the facility and equipment are in safe conditions for Employees. All noted unsafe areas are placed in a safe condition prior to Employees working in the area.

Weekly Supervisor Inspections are conducted and recorded with a Employee. This documented inspection provides a focus to ensure current hazard controls are still effective, equipment is in safe condition and safe work practices are in use. Discrepancies are listed on the inspection sheet, recorded on work orders for correction. The inspection sheet is forwarded to the Safety Manager for review and logging to track discrepancy correction.

Monthly Safety Committee Inspection. Each month members of the Safety Committee will tour the entire facility with the Safety Manager. This tour is to ensure Safety Committee Members are familiar with all areas of the operation. Record of problem areas, committee recommendations and deficiencies will be recorded and provided to management.

Noise Surveys are conducted at least annually, or whenever facility modifications are made that impact the ambient or specific work area noise levels. Noise surveys are conducted by qualified persons with calibrated instruments.

Equipment Inspections are conducted to ensure specific safety equipment is in good working order and will function when needed. Examples and frequencies are:

- Sprinkler Inspection - Monthly
- Boiler Checks- Weekly
- Emergency Lighting Test - Monthly
- Fire Extinguisher Inspections - Monthly
- Safety Equipment Inventories - Monthly
- Boiler Tests - Monthly
- Emergency Lighting 90 Min. Test - Semiannually
- Respirator Inspections- Before / After Use (Monthly at a minimum)
- Boiler Internal Inspections - Annually (by qualified inspector)

Program Audits are conducted to check the administration of specific safety and health programs. Program Audits of the following shall be conducted annually.

- Accident Prevention
- Fire Prevention
- Material Handling
- Flammable Material Storage
- Lockout-Tagout
- Hazard Communication
- Personal Protective Equipment
- Confined Space Entry
- Asbestos Controls
- Boiler Safety
- Bloodborne Pathogens
- Contractor Safety
- Electrical Safety
- Tool Safety
- Hot Work
- Respiratory Protection

Records

Records of audits and inspection will be maintained in accordance with the requirements of the specific programs. As a minimum, the last two program audits will be kept on record. Routine inspection records will be maintained on a most current basis. Records of deficiency corrections will be maintained for one calendar year from date of correction.

Conducting Safety Audits

There are four basic questions an audit should answer. The persons or team designated to conduct the audits should take a fact-finding approach to gather data. These auditors should be familiar with both the company program and the various local, state and federal requirements. All audit comments, recommendations and corrective actions should focus on these four questions:

1. Does the program cover all regulatory and best industry practice requirements?
2. Are the program requirements being met?
3. Is there documented proof of compliance?
4. Is employee training effective?

Phase One: Audit Preparation

Step One - one week prior to the audit, inform all affected managers and supervisors. They should be directed to have all records, documents and procedures available when the audits start.

Step Two - Review all past program area audits and corrective action recommendations.

Step Three - Review all company, local, state and federal requirements for the specific program. Become familiar with the document, inspection and training requirements.

Step Four - Determine the scope of the audit. This can be based on accident and inspection reports and input from various managers. Set a start and stop time & date for the audit.

Phase Two: Fact Finding

A fact-finding event is used to gather all applicable information. Auditors should make an effort not to form an opinion or make evaluative comments during this phase.

A Team Approach - If an audit team is used, make assignments to each person that defines their area of inspection. Ensure they have the proper program background information and documents.

Audit Areas - most audits can be broken down into these areas:

Employee knowledge – OSHA standards require "effective training" - an effective program ensures that employees have the knowledge required to operate in a safe manner on a daily basis. The level of knowledge required depends on the specific activities in which the employee is involved and their specific duties and responsibilities. Generally,

managers and supervisors should have a higher level of knowledge than general employees. This includes practical knowledge of program administration, management and training. They should be able to discuss all elements of each program that affects their assigned employees. Many programs divide employees into these two groups-authorized employees and affected employees. Authorized employees must have a high level of working knowledge involving hazard identification and hazard control procedures. Determining employee level of knowledge can be achieved through written quizzes, formal interviews or informal questions in the workplace.

Written Program Review - during the audit, a comprehensive review of the written program should be conducted. This review compares the company program to requirements for hazard identification and control, required employee training and record keeping against the local, state and federal requirements. Additionally, if applicable, the company insurance carrier should be asked to conduct an independent written program review.

Program Administration - This review checks the implementation and management of specific program requirements. This section asks these and other similar questions:

1. Is there a person assigned and trained to manage the program?
2. Are specific duties and responsibilities assigned?
3. Are sufficient assets provided?
4. Is there an effective and on-going employee training program?

Record & Document Review - Missing or incomplete documents or records is a good indication that a program that is not working as designed. Records are the company's only means of proving that specific regulatory requirements have been met. Record review also includes a look at the results, recommendations and corrective actions from the last program audit.

Equipment and Material - This area of an audit inspects the material condition and applicability of the equipment for hazard control in a specific program. Examples of audit questions for this area are:

1. Is the equipment in a safe condition
2. Is there adequate equipment to conduct tasks safely
3. Is personal protective equipment used and stored properly
4. Is equipment, such as exit lights, emergency lights, fire extinguishers, material storage and handling equipment designed and staged to control hazards effectively?

General Area Walk-Through - While audits are not designed to be comprehensive physical wall-to-wall facility inspections, a general walk-through of work areas can

provide additional insight into the effectiveness of safety programs. Auditors should take written notes of unsafe conditions and unsafe acts observed during the walk-through.

Phase Three: Review of Findings

After all documents, written programs, procedures, work practices and equipment have been inspected, the audit team must formulate a concise report that details all areas of the program. Focus on the four basic audit questions. Each program requirement should be addressed with deficiencies noted. Include comments of a positive nature for each element that is being effectively managed.

Phase Four: Recommendations

Develop recommended actions for each deficient condition of the program. Careful forethought should be applied to ensure that this is not a process that simply makes more rules, additional record keeping requirement or makes production tasks more difficult. Examine the manner and means in which the current deficient elements are managed to determine if there is a simpler procedure that can be employed.

Phase Five: Corrective Actions

Development of corrective action should involve the managers and supervisor who will be required to execute the corrections. Set priorities based on level of hazard. All corrective actions should be assigned a completion and review date. Records of completed corrective actions should be reviewed through the normal management chain and then be filed for use during the next audit.