

Disciplinary Action Procedure

January 2023

A. Role Of Disciplinary Systems in The Workplace

The disciplinary system does not exist primarily to punish employees. Its purpose should be to control the work environment so that workers are protected, and accidents are prevented. A disciplinary system helps ensure workplace safety and health by letting IPS★ITCS employees know what is expected of them. It provides workers with opportunities to correct their behavior before an accident happens.

A disciplinary system is one of the keys to successfully implementing IPS★ITCS safety and health program. It ensures that IPS★ITCS rules and safe working practices are taken seriously by employees and are followed. It lets employees know how IPS★ITCS expects them to operate in relation to the goals of IPS★ITCS safety and health program. And it lays out the actions IPS★ITCS will take if individuals do not meet IPS★ITCS expectations. The employee's supervisor and all members of management are responsible for the enforcement of this disciplinary program.

A disciplinary system cannot work in a vacuum. Before IPS★ITCS can hold employees accountable for their actions, IPS★ITCS first needs to establish its safety and health policy and disciplinary rules.

B. Policy Statement

Employees need to know IPS★ITCS position on safety and health and what IPS★ITCS expects of them. They need a clear understanding of the rules and the consequences of breaking those rules. This is true in all areas of work, but it is especially important for worker safety and health. As part of the policy statement, and in the employee safety handbook, IPS★ITCS has a written statement setting forth IPS★ITCS disciplinary policy. Company managers and supervisors will always be on the lookout for safety violations and will conscientiously and vigorously enforce IPS★ITCS commitment to safety.

C. Explanation Of Major and Minor Offences

It is important that employees understand the system and have a reference to turn to if they have any questions. Therefore, in addition to issuing a written statement of IPS★ITCS disciplinary policy, IPS★ITCS has drawn up a list of what it considers major violations of Company policy and less serious violations. This list specifies the disciplinary actions that will be taken for first, second, or repeated offenses.

IPS*ITCS will use the 5-Step Disciplinary System listed in Appendix A of this procedure to correct minor, "General Offences" (that are listed on the next page). IPS*ITCS Management will issue a Safety Hazard Citation to document these offenses, and/or a Termination Acknowledgement to discontinue employment of employees that have committed a major offense or continued general offenses.

1. The list for immediate termination and grounds for immediate discharge are:

- Drinking alcohol, and/or drug abuse prior to or during working hours
- Fighting, provoking, or engaging in an act of violence against another person on Company property
- Theft
- Wilful damage to property
- Failure to wear Personal Protective Equipment (eye protection, hearing protection, safety helmets, etc.).
- Not using safety harnesses and lanyards when there is a potential for falling
- Removing and/or making inoperative safety guards on tools and equipment
- Tampering with machine safeguards or removing machine tags or locks
- Removing barriers and/or guardrails and not replacing them
- Failure to follow recognized industry practices
- Failure to follow rules regarding the use of company equipment or materials
- Major traffic violations while using a company vehicle
- Engaging in dangerous horseplay
- Failure to notify IPS*ITCS of a hazardous situation and
- Other major violations of company rules or policies

2. General Offences requiring a warning and can lead to termination:

- Traffic violations while using Company vehicles
- Creating unsafe or unsanitary conditions or poor housekeeping habits
- Threatening an act of violence against another person while on company property

- Misrepresentation of facts
- Unauthorized use of Company property
- Excessive tardiness and late to work
- Disrespect and/or insubordination to authority
- Other violations of Company Policy and rules

D. Training

Training can reduce the need for disciplinary action. IPS*ITCS shall instruct employees in the importance of workplace safety and health, the need to develop safety habits, IPS*ITCS operations, safe work practices, and the hazards they control, and the standards of behavior that IPS*ITCS expects. IPS*ITCS employees must understand the disciplinary system and the consequences of any deliberate, unacceptable behavior.

E. Supervision

Supervision includes both training and corrective action. Ongoing monitoring of IPS*ITCS employees' work and safety habits gives IPS*ITCS supervisors the opportunity to correct any problems before serious situations develop. In most cases, effective supervision means correcting a problem before issuing any punishment.

Where the relationship between employees and their supervisors is open and interactive, problems are discussed, and solutions are mutually agreed upon. This type of relationship fosters a work environment where the need for disciplinary action is reduced. When such action is needed, the parties are more likely to perceive it as corrective than punitive.

Supervisors are under the same level of disciplinary actions as employees. If a company official detects an overall lack of commitment to company safety goals the supervisor shall also be disciplined according to this policy.

F. Employee Involvement

Employees are encouraged to help informally in the enforcement of rules and practices. The intent here is not to turn employees into spies and informers, but to encourage them to be their "brother's keeper" and to watch out for the safety

and health of their colleagues. Many employers successfully have encouraged an atmosphere -- a company "culture" – where employees readily speak up when they see an easily corrected problem, for example, a co-worker who needs reminding to put on safety goggles.

IPS★ITCS employees deserve the opportunity to correct his or her own behavior problems. An effective disciplinary system is a two-way process. Once a problem is spotted, discuss it with the employee, who should be given at least one or two opportunities to change the behavior or correct the problem. Only after these discussions (and possibly some retraining) should disciplinary action be taken.

G. Appropriate Control Measures

Disciplinary actions need to be proportionate to the seriousness of the offense and the frequency of its occurrence. It is certainly inappropriate to fire someone for occasional tardiness. It is equally inappropriate to issue only oral warnings to an employee who repeatedly removes a machine guard. Appendix B of this procedure provides an example of disciplinary actions in a five-step disciplinary system.

Disciplinary procedures should not be instituted without explanation. IPS★ITCS will provide feedback to the employee on what behavior is unacceptable, why the corrective action is necessary, and how the employee can prevent future violations and disciplinary action. In addition, take time to recognize an employee who improves or corrects his/her behavior.

H. Consistent Enforcement

Workers must realize that safe work practices are a requirement of employment and that unsafe practices will not be tolerated. It is necessary, therefore, that the employer have a disciplinary system that is implemented fairly and consistently.

If IPS★ITCS disciplinary system is to work well and be accepted by IPS★ITCS workforce, the system applies equally to everyone. This includes subjecting managers and supervisors to similar rules and similar or even more stringent disciplinary procedures.

For minor violations, supervisors shall meet with the employee to discuss the infraction and inform the employee of the rule or procedure that was violated AND describe the corrective action needed to remedy the situation.

I. Documentation

One key to ensuring fairness and consistency in a disciplinary system is keeping good records. It is in the best interest of both IPS★ITCS and the employee to have written rules and disciplinary procedures.

It is just as important to document instances of good or poor safety and health behavior, including discussions with the employee, and to place relevant information in the employee's personnel file. The "Safety Hazard Citation" on the next page will be used to document infractions.

Documentation serves a variety of purposes. It helps IPS★ITCS to track the development of a problem, corrective actions, and the impact of measures taken. It provides information so IPS★ITCS can keep employees informed of problems that need correction.

When IPS★ITCS is evaluating the managerial and supervisory skills of a supervisor, it provides a useful record of how they handled problems.

If warnings, retraining, and other corrective actions fail to achieve the desired effect, and if IPS★ITCS decides to discharge an employee, then documentation becomes even more critical. Conversely, IPS★ITCS will conduct an annual clearing of the personnel files of employees whose good overall safety records are marred by minor warnings.

Minor safety violations will be documented, and a copy of the below form will become part of the employee's personnel record:

Safety Hazard Citation

Date: _____

Name of Violator: _____

Location of Violation: _____

Type of Violation: _____

Violator's Signature: _____

**** A Copy of this Citation will be placed in the employees Employment File**

**** Three Citations can be grounds for termination**

Termination Acknowledgement

Date: _____

Employee Name: _____

Reason for Termination:

Employee Signature: _____

Supervisor Signature: _____

IPS*ITCS Manager Signature: _____

Employee Eligible for Re-employment? **Yes** **No**

If yes, Date of Eligibility? _____/_____/_____

J. Positive Reinforcement

Each supervisor should provide frequent reinforcement of work practices training. The informal observation described above serves not only to gauge training effectiveness, but also to reinforce the desired behavior. Some worksites also provide special recognition for the use of safe work practices. Some supervisors periodically hand out "Thank you for working safely" cards that can be redeemed for a free cup of coffee or soft drink. Other supervisors periodically observe individual workers at their tasks and give oral and/or written feedback on what was done safely.

OSHA recommends award systems that recognize positive activities rather than absence of injuries. Award programs with prizes for hours worked without injury can put heavy pressure on workers not to report injuries.

K. Reward System

Rewarding safe behavior is at least as important as correcting and punishing unsafe actions. Positive feedback can be a powerful motivator. It is especially important to recognize self-initiated acts of safety or health protection, those times when employees, of their own accord, act to protect themselves or others.

A reward system can be very simple and inexpensive: letters or certificates of appreciation, a few hours of paid leave, a special and convenient parking space for a month in IPS★ITCS parking lot, a small pin or tie tack. Rewarding an employee for good safety and health behavior not only recognizes the employee, but it also provides incentive to other workers. Public recognition is likely to be more important than monetary value when distributing one-time awards. Of course, taking safety and health performance into account when promoting employees or issuing bonuses is probably the most meaningful reward.

One type of reward program can backfire and should be avoided. Rewards based on the least number of accidents can do more harm than good. They tend to create pressure on employees to avoid reporting injuries and illnesses. For best results, IPS★ITCS shall emphasize the positive: reward IPS★ITCS employees' constructive safety and health efforts.

L. Manager's Disciplinary System Worksheet

The nature and severity of disciplinary action should be appropriate for the seriousness and frequency of the violation. Below are a series of questions designed to help you develop a disciplinary system that best meets the needs of IPS★ITCS workplace. Managers already may have addressed the first two areas when developing safe work practices for various jobs.

If management has not yet developed these practices, it makes sense to do so before developing a disciplinary system. Other workplace problems, such as attendance and attitude, are equally important but are not addressed here.

Operations.

- What key operation(s) occur at IPS★ITCS workplace?
- What equipment is used?
- By whom?
- What materials are used, and by whom?
- Are there any hazards associated with the use of the equipment or the materials?

Practices and Procedures.

- What are the key types of jobs at IPS★ITCS workplace?
- What do most people do in the course of their work?
- What is the most efficient way for them to perform their jobs?
- What is the safest way for them to perform their jobs?

(Note: You will need to perform a job hazard analysis to properly answer this. For information, see OSHA Publication 3071 (Revised 1992), "Job Hazard Analysis."

Problems.

- What would happen if a job or procedures were not done safely?
- Exactly what would happen if an employee performed in an unsafe or unhealthful manner?
- What would happen if all employees did the same thing?
- How serious would the consequences be?
- Would the unsafe action or behavior affect just one employee, or all employees?

4. Correction.

For each type of safety and health violation you have identified, what kind of corrective action seems appropriate?

What would you do for a second offense, or for repeated violations of the same rule? Should warnings be oral or written?

How long a suspension is warranted for what type of violation?

Are there any actions that should automatically result in termination?

For this last stage in developing IPS★ITCS disciplinary system, you may find it helpful to develop a grid, like the one on the next page, to identify corrective actions for different kinds of violations and repetitions.

Appendix A

In the example below, a few types of safety problems are listed on the left and their frequency across the top. Fill in each box with the type of corrective action that you consider appropriate. Examples include oral warning, written warning, re-instruction, suspension, and termination.

	First Offense	Second Offense	Repeated Violations
Unsafe Work Habits			
Refusal to Follow Safety Instructions			
Unsafe Actions that Jeopardize Self and Others			

M. Five-Step Discipline System

- **First violation:** Instruction/discussion concerning violation, proper procedures, and the hazards they control; notation for the supervisor's file.
- **Second violation:** Re-instruction with notation in the employee's personnel file.
- **Third violation:** Written warning describing the violation and actions that will be taken if it recurs.
- **Fourth violation:** Final warning; may include suspension.
- **Fifth violation:** Discharge.

It is Company philosophy that all employees be trained in proper safety procedures and employees are expected to follow and adhere to all aspects of Company Safety Program. The close observance of all Federal, local and client rules and regulations will be always monitored.

If there is an infraction of these rules and regulations – the following disciplinary action will be taken:

Minor Infraction

Definition: Any infraction of government, corporate or client rules that does not have the immediate potential of causing serious damage or injury.

1st offense – verbal warning from supervisor or management

2nd offense – written notice with notice placed on file

3rd offense – written notice + time off without pay

4th offense – termination of employment

Major Infraction

Definition: Any infraction of government, corporate or client rules that does have the potential to cause immediate serious damage or injury.

1st offense – time off without pay or termination

2nd offense – termination of employment

****MANAGER'S NOTE:** The use of these corrective procedures obviously will vary with the nature of the problem and the frequency with which it occurs. Violations of company rules generally are considered more serious than other employee behavior problems, but all require correction. Keep in mind -- and tell IPS★ITCS employees -- that IPS★ITCS primary goal is to prevent accidents by controlling unsafe acts and conditions.

Competency Assessment

No.	Questionnaire	C/NYC
Q1		
A1		
Q2		
A2		
Q3		
A3		
Q4		
A4		
Q5		
A5		

Enclosed Attachments	
Risk Assessment	<input checked="" type="checkbox"/>
Environmental Aspect and Impact	<input checked="" type="checkbox"/>
Training and Competency	<input checked="" type="checkbox"/>
Measure and Evaluation Tools	<input checked="" type="checkbox"/>

Competency Checklist

To be filled out by Trainer and signed by Employee, Assessor and Supervisor before being returned to the HSEQT Manager for recording purposes.

Procedure	Competency	Date	Competent YES / NO	Employee Signature

(Please tick appropriate box)

This employee is competent in performing the job.

This employee has not attained the competency level.

*

* *If the employee has not attained all competency levels, the General Manager must assess the action to be taken, provide an extension of training or alternative action as listed below.*

Alternate action to be taken: _____

Signed By	Employee:	_____	Date:	_____
	Trainer:	_____	Date:	_____
	Assessor:	_____	Date:	_____
	Regional Manager:	_____	Date:	_____

Environmental Aspects and Impacts

Identified Environmental Aspects and Impacts

The following table is a summary of the likely environmental aspects and impacts that may be identified during site inspections. The significance of each impact needs to be assessed using the Risk Assessment Model.

Activity	Aspect	Impact
Purchasing & Administrative Work	Consumption of goods	Conservation of natural resources
	Consumption of energy (eg. Electrical equipment and facilities)	Release of greenhouse gases and atmospheric pollution; Consumption of natural resources; Habitat loss
	Generation of waste (eg. Paper)	Consumption of space for waste disposal; Habitat loss
Climate Control	Consumption of energy	Release of greenhouse gases and atmospheric pollution; Consumption of natural resources; Habitat loss
	Generation of noise	Disturbance to community; Habitat loss
Cleaning of – offices / vehicles	Storage, use and release of chemicals	Contamination of air, water or soil; Risk to human health
Transport (Fleet vehicles / staff travel)	Consumption of energy	Release of greenhouse gases and atmospheric pollution; Consumption of natural resources; Loss of habitat at all stages of generation; Light pollution
	Consumption of goods (eg. Oil)	Consumption of natural resources; Generation of waste; Habitat loss; Biodiversity impacts
	Generation of waste (eg. Oil)	Consumption of space for waste disposal; Potential contamination of water or soil; Habitat loss
	Exhaust emission	Release of greenhouse gases and atmospheric pollution
	Use of dangerous goods (eg. Batteries)	Potential contamination of air, water or soil; Risk to human health
	Generation of noise	Disturbance to community; Habitat degradation
Operations		

Sample only.
To be filled in

Risk Assessment



Risk Assessment // insert name here

<p>Step No: Logical sequence</p>	<p>Sequence of Basic Job Steps documented in the Procedure, Work Instruction and project plans. Break down Job into steps. Each step should be logical and accomplish a major task.</p>	<p>Potential Safety & Environmental Hazards/Impacts at the site of the Job Identify the actual and potential health and safety hazards and the environmental impacts associated with each step of the job.</p>	<p>Risk Rating Refer to the risk matrix or HSEQT.PRO. Risk Mgt</p>	<p>Recommended Corrective Action or Procedure <i>Determine the corrective actions necessary to reduce the risk to as low as reasonably practical (ALARP) refer to HSEQ.PRO.Risk Mgt. The risk must be reduced or controlled to ALARP before work commences.</i> Document who is responsible for implementing the controls to manage each hazard identified.</p>	<p>Risk Rating refer to the risk matrix or HSEQT.PRO.Risk Mgt</p>
1.					
2.					
3.					
4.					
5.					

Audit



Process: insert// Procedure: Insert //		Date:	Audited by:	
		Location of Audit:	Area Mgr/Supervisor:	
Item	Question	Evidence Sited	Comments	Conformance Score 0,3,5
1.				
2.				
3.				
4.				
5.				
6.				
7.				
AUDITOR'S SIGNATURE:		CONFORMANCE SCORE: / 25		0 – Non-Conformance 3 – Continuous Improvement Opportunity 5 – Total Conformance
SAFETY REP'S SIGNATURE:		CONFORMANCE %:		