

Responsibilities and Authorities Procedure

January 2023

The management of IPS★ITCS is dedicated to providing the active leadership and support necessary to develop and maintain a successful safety and health program. Management at every level has the responsibility to actively execute the safety program and their continued involvement is considered mandatory. The safety and health of each IPS★ITCS employee is the primary consideration throughout all phases of any job assignment. This program applies to all IPS★ITCS employees and job locations.

A. Managers and Supervisors

1. Ensure that all sections of the corporate safety program applying to work under their control are carried out to provide a safe working environment for all assigned employees.
2. Post safety rules and regulations and inform all affected employees of any changes.
3. Comply with all safety rules and regulations.
4. Assure that all employees under their supervision comply with the safety rules and regulation delineated in this plan.
5. Ensure that all employees understand that they must comply with client safety rules and regulations while visiting or working at the client's site.
6. Complete and promptly submit accident reports on all accidents and injuries in accordance with this plan.
7. Conduct safety inspection in accordance with this plan.
8. Conduct employee safety meetings in accordance with this plan and provide necessary reports to the Corporate Office.
9. Take immediate action to eliminate any unsafe or hazardous act or working conditions of which he/she becomes aware. Report the act or condition and the corrective action taken to the next level of management as soon as possible.

10. Initiate requests for physical examinations and/or employee record reviews before employees are assigned to possibly hazardous areas.

11. Review all new out-of-office assignments to determine if exposure to hazardous material or any unusually hazardous conditions are anticipated. Where there is a potential for hazardous material exposure, ensure that a Job Safety Analysis is formulated and reviewed with the employee. Ensure that appropriate training is provided, exposure documentation is prepared and required medical examinations are accomplished and documented where required.

12. Ensure that additional safety rules and regulations and supplemental plans are issued, as required, for the specific job and site job and site conditions. Corporate Safety shall review the additional requirements prior to issuance and a copy provided to the Corporate Office.

13. Location Managers will ensure that their location is in compliance with all applicable rules and regulations. Where hazardous materials are present on the job site, the Location Manager will ensure that his/her staff has access to Safety Data Sheets (SDS) and are trained in the requirements that apply to his/her situation.

B. Project Managers

Each Project Manager is designated as the competent person on site and will be responsible for the implementation of the IPS★ITCS Safety and Health Plan with respect to his/her project team. While the Project Manager is the primary person responsible for all aspects of protecting the health, safety, and well-being of all IPS★ITCS employees working on a project, alternates may be assigned to support this responsibility. On each project a copy of ***HSE.FOR.Personnel List.2022***, will be completed and posted at the job site along with other required postings. This form will identify the primary person responsible for managing the safety program along with any designated alternates (***HSE.FOR.Personnel List.2022***). In addition, the Project Manager will:

1. Make specific written inquiries of the client's representative to determine if any additional safety or health issues are known to be involved. If so, additional regulations or special instructions should be provided to IPS★ITCS staff members working on the project.
2. Ensure that any special safety equipment, training sessions or other safety awareness items required for a site visit will be accomplished prior to any IPS★ITCS employee being exposed to the identified hazard.

3. Adhere to provisions described in this plan. Where hazardous materials are present at the jobsite, the Project Manager will ensure that their staff has access to the SDS's and are trained to the required level that apply to his/her work.

C. Individual Employees

1. All employees must be fully aware of their responsibility to achieve an accident and incident-free work environment.

2. Each employee is expected to review each task and work assignment to identify the potential safety and health hazards involved. Then each employee is expected to plan and accomplish the work safely.

3. Each employee will adhere to all IPS★ITCS and general safety rules and regulations.

4. Each employee will comply with client's safety rules and regulations while working at their facility.

5. Each employee will report unsafe conditions and practices to their supervisor.

6. Each employee will attend safety meetings as scheduled.

7. Each employee will report all accidents and injuries, no matter how minor, to a supervisor as soon as possible.

D. Personnel On Individual Assignment to A Client's Facility

IPS★ITCS employees on assignment at a client's facility shall be responsible for knowing and following the IPS★ITCS Safety and Health Policies and Procedures in addition to any requirements by the client's safety program. Where the client's safety regulations are more stringent than IPS★ITCS policies,

the employee will report to IPS★ITCS in accordance with this program. A copy of any written report and/or investigation made by the client should also be forwarded to the IPS★ITCS Supervisor or the team leader as soon as possible.

Each employee on assignment to a client's plant where hazardous materials are present at the job site will assure that he/she has access to the SDS's and is trained to the required level. Each employee shall also ensure that the client has provided information as to any fire, explosion or toxic exposure that may be encountered onsite.

E. OSHA Inspections

Employers must provide a place of employment free from recognized hazards likely to cause, death or serious physical harm. The employer also has the duty of complying with safety and health standards promulgated under the Act.

This procedure outlines the responsibilities of our project management team in controlling OSHA inspections and guidelines in fulfilling those responsibilities.

The project manager must designate two members of management as project representatives to participate in the OSHA inspections. On projects with a safety advisor (i.e., Safety Supervisor or HSEQT Manager), one of the project representatives must be the safety advisor.

1. COMMENCEMENT OF INSPECTION

As soon as the OSHA Compliance Safety Health Officer (CSHO) arrives at the project site, notify the project manager, the HSEQT Manager, and the client, when applicable.

An employer has the right to know who is entering their premises. The Act specifically provides that "upon presenting appropriate credentials to a member of management, "the CSHO shall be allowed to enter the premises without delay. This means that the highest official available within management is entitled to determine whether this person is really a certified government safety inspector before he or she must allow him/her to inspect the premises.

This does not mean that an employer can abuse the right as a means of delaying the inspection entry, but it does mean that the inspector can be asked to wait a few minutes while the highest ranking official of the employer is notified. Of course, if this person is unavailable, then the next highest-ranking manager shall receive the inspector.

When additional persons accompany the CSHO, the employer is entitled to examine their credentials to determine whether they are appropriate representatives of the U.S. Department of Labor.

Under the Act, only representatives of the secretary of labor, accompanied by a representative of the employer, and a representative authorized by the employer are to conduct the investigation. This provision gives a very important protection against outside parties entering a job who may have interests at variance with the employer.

In the situation where a person wishing to participate in the inspection is neither a CSHO nor a representative authorized by the employer, management shall carefully question this person to determine their affiliation or capacity and why they are present for the safety inspection.

Under the present status of the law, this outside party has no apparent right to participate in the inspection without the employer's consent. The best rule to follow is one of common sense and reasonableness.

If this person has been brought by the CSHO as an expert consultant, for example, and is otherwise a disinterested party to the investigation, let them participate. On the other hand, if the person's presence will be of questionable value concerning matters of health and safety in the workplace, and their real interest in the job is dubious, then management should politely ask the outside party to wait until top management can be consulted on the matter. In the event, however, the CSHO(s) presenting proper credentials should not be delayed in their entry to the premises.

2. CSHO(S) ARE AUTHORIZED BY OSHA TO PERFORM THE FOLLOWING:

- a. Upon presentation of credentials, enter any work area without delay, at any reasonable time, and without advance notice.
- b. Inspect the place and conditions of employment, equipment, machinery, devices, and the processes or methods being utilized.
- c. Check record keeping procedures and to investigate accidents.
- d. Take photographs and to collect samples or evidence.

Note!!! Care should be taken to identify “trade secret” items so that photographs and/or field notes/citations properly reflect this sensitivity.

- e. To confer privately with employees of their choice concerning conditions or procedures.

Note!!! Employees should be informed that they have the right to have a member of management present during the interview if they so wish

- f. To review their findings with the designated management representatives.

- g. Citations may result from the inspection. Such notice will be submitted in written form following completion of the inspection.

- h. They are authorized to re-enter the premises to determine that correction of violations has been made within the time established.

3. OPENING A CONFERENCE

The project manager and project representatives must attend the opening conference. The project manager will be the sole spokesperson during the conference.

The type and scope of the inspection and existence of a warrant, if any, must be determined. If a complaint or warrant exists, the CSHO will provide you with copies at this time. In all cases, the appropriate regional managers should be notified.

4. WALK-AROUND PHASE OF INSPECTION

a. General

One project representative will be assigned “spokesperson” duties during the walk around inspection, and the other will be assigned note-taking duties. The spokesperson will be the sole spokesperson during the walk-around phase of the inspection.

Care must be taken when responding to inquiries by the CSHO. Listen carefully to the questions asked, ensuring your answer is accurate and complete. Judgmental statements on the spokesperson's part are to be avoided.

IPS★ITCS will maintain and make available information regarding all records as required by federal, state, and local regulations.

b. Conduct

Courteous treatment of the CSHO is always expected and the following principles must be followed during the walk-around phase.

1. Do not agree that any alleged violation exists.
2. Do not point out any possible/potential problem areas.
3. Do not indicate that you have been or are aware of any alleged violations.
4. Do not argue with the CSHO whether a violation or problem exists.
5. Do not volunteer any information or make any admissions.

c. Records

OSHA places emphasis on the good faith of the employer.

1. IPS★ITCS will post and maintain in a conspicuous place, copies of the OSHA notice, "Safety and Health Protection on the Job."
2. An awareness of the Act exhibited by the effectiveness of the employer's safety and health program and required record keeping.

3. Documented compliance with the Act by establishing a safety policy.

5. INFORMATION REQUESTED BY COMPLIANCE OFFICERS

Some indications of what OSHA CSHO's are looking for may be found in the Department of Labor evaluation form. The major headings and their subjects include the following:

a. Safety Staff

1. How large is the safety staff?
2. Are their duties full or part-time?
3. What other duties do they perform?

b. Safety Committee

1. Who is represented on the committee, if one exists?
2. How often does it meet?

c. Safety Training

1. Who conducts the training and how is it programmed?
2. Is it formal or on-the-job training?

d. Medical Programs

1. What professional medical personnel are available?
2. Are they full-time, part-time or consultants?
3. Are trained first-aid personnel and first-aid equipment available?
4. Are pre-employment and annual physical examinations required?
5. Is there a sight and hearing conservation program in force?
6. In hazardous occupations are there periodic and follow-up examinations?

e. Personal Protective Equipment

1. What protective equipment is provided for foot, eye/face, respiratory, hand/skin, safety belts, hearing loss, and rescue?

f. Accident Investigation

1. Who conducts investigation?
2. Who makes the analysis and takes corrective action?
3. Who makes a follow-up inspection?
4. Who enforces safety rules?
5. Are no-injury accidents investigated?

g. Incentive Rewards

1. Are incentive awards given for safety and how are they awarded?

h. Publicity/Promotion

1. How is safety publicized and promoted?
2. Are rules and standards available and understood?
3. Are posters and bulletin boards used?
4. Are safety meetings held with employees?

i. Management Interest (On a day-to-day basis, not just during inspection)

1. Does management exhibit a good faith effort?
2. What is the injury/illness rate?
3. What are the costs of injuries or sickness?

**** Notes must be made of records furnished, records not furnished, and any comments made by the compliance officer relating to the records.***

6. TESTS

Every test made by the CSHO during the inspection must be documented with the following information:

a. Purpose of the test

- b. Time and date of the test – start/completion time
- c. Test equipment used
- d. Name and department of employee(s) participating in the test
- e. Area in which the test was made.
- f. Location of testing equipment and distance from closest employee
- g. Result of the test, if available, or results as discussed at closing conference

7. PHOTOGRAPHS

Every photograph taken by the CSHO must be documented, including:

- a. Time the photograph was taken
- b. Type of camera used
- c. Area in which the photograph was taken
- d. Location of the camera in the area when the photograph was taken
- e. Distance of the camera from the subject

The CSHO should be required to mark “Confidential-Trade Secret Area” on back of any instant-print photograph taken in any trade secret area.

It is required that the project takes photographs at the exact time, and they should be documented for the record. If photos cannot be taken during the inspection, they must be taken immediately after.

8. EMPLOYEE INTERVIEW

If the CSHO requests private interviews with employees, such interviews should be scheduled to minimize interference with production. If possible, have the CSHO conduct

the interview at the employee workstation.

Note!!! Under no circumstances will any employee be questioned by project management about the private interview without express approval of the Corporate Safety Department.

9. CLOSING CONFERENCE

The following information must be obtained from the CSHO:

- a. Exact nature of an alleged violation, including specific location.
- b. Exact standard or general duty clause allegedly violated.
- c. Copies of all standards allegedly violated.
- d. Exactly how the CSHO believes compliance can be affected.

Note!!! During the closing conference, it is common for the CSHO to ask what a reasonable time period for abatement is. Take into consideration what will be required prior to suggesting an abatement date.

10. THE CITATION

Alleged violations will be described in a citation with references to applicable standards, rules, regulations, and provisions of the Act. These violations must be corrected on or before the date shown. Management will forward a copy of the citation to the Corporate Law Department as soon

as possible. The Law Department will coordinate the corporation's response.

a. POSTING OF CITATION

A copy of any citation(s) shall be posted "in a conspicuous place upon receipt" at or near each place a violation referred to in the citation occurred. It must remain posted until all violations cited therein are corrected, or for three (3) working days, whichever period is longer (working days meaning Monday through Friday, not including weekends and federal holidays).

11. AFTER INSPECTION

a. ABATEMENT

An employee or representative of employees may file a notice (letter) to contest the reasonableness of the time stated in the citation for the abatement to the alleged violation(s).

Alleged violations that are not contested shall be corrected within the abatement period specified in the citation. Failure to correct an alleged violation within the abatement period may result in further proposed penalties for each day the alleged violation has not been corrected. Timely correction of an alleged violation does not affect the initial proposed penalty. Correction of alleged violations, which have an abatement period of thirty-days (30) or less, must be reported in writing to the area director promptly upon correction. Reports of correction will show specific corrective action of each such alleged violation and the date of such action on alleged violations having abatement date of more than thirty-days (30).

A written progress report must be submitted every thirty-days (30). The progress report should detail what has been done, what remains to be done, and the time needed to fully abate each violation. When the alleged violation is fully abated, the area director should be so advised.

b. INFORMAL CONFERENCE

IPS★ITCS may request a meeting for informal discussion with the area director concerning results of the inspection (abatement, dates, citations, penalties).

A request for an informal discussion cannot extend the fifteen (15) working day period allowed for filing the notice of contest. Therefore, a request for an informal discussion should be brought to the attention of the area director prior to the end of the fifteen (15) working days allowed for filing a notice of contest, preferably as soon as possible.

c. REPORT

The project manager will have a confidential written report prepared of the overall inspection to be sent to the director, Corporate Safety. The note taker will prepare the report with the assistance of the walk-around spokesperson.

12. APPLIES TO

International operations

The above procedures for undertaking inspections refer to United States OSHA requirements and may require some modifications to comply with other local national requirements; nevertheless, any such modified inspection procedures shall be carried out in compliance with company practice.

Revision History

Rev	Rev Date	Rev By	Approved By	Description
1.0	1.3.2022	Shayne Torrans	Shayne Torrans	Initial Procedure Document
1.1	11.23.2022	Shayne Torrans	Shayne Torrans	Format Revision

Approvals:

Procedure Owner

Print Name

Date

Signature

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		

Activity	Aspect	Impact

Risk Assessment

Risk Assessment // insert name here

Step No: Logical sequence	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.	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.	Risk Rating Refer to the risk matrix or HSEQT.PRO. Risk Mgt	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.	Risk Rating refer to the risk matrix or HSEQT.PRO.Risk Mgt
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: SAFETY REP'S SIGNATURE:		CONFORMANCE SCORE: / 25 CONFORMANCE %:		0 – Non-Conformance 3 – Continuous Improvement Opportunity 5 – Total Conformance