POLICY AND PROCEDURE

OCCUPATIONAL HEALTH AND SAFETY PLAN 7010

It is Bullhook Community Health Center’s belief that our people are our most important asset and that the preservation of employee Safety and Health must remain a constant consideration in every phase of our business. Safety begins at the top and goes downward throughout the company. Our goal is to have an injury free work place. It is our intent to provide a work environment as free of hazards as possible.

All employees are responsible for working safely and productively, always remaining aware of hazards in their jobs and following recognized safe work practices, including the use of Personal Protective Equipment (PPE).

Production is not so urgent that we cannot take the time to do our work safely.

SAFETY MEETINGS
The Occupational Health and Safety program shall be reviewed annually and be revised, updated or changed at that time if needed. All employees of Bullhook Community Health Center, Inc. shall attend and participate in monthly safety meetings held in conjunction with the monthly Staff Meeting.

A minimum of 15 minutes shall be given to safety during the monthly staff meeting. The Safety Officer shall use this time for training and to discuss problems that have arisen or that are anticipated along with any other safety and health topics.

ASSIGNMENT OF RESPONSIBILITY

Safety Officer:

Bullhook Community Health Center, Inc. shall designate a safety officer.

It shall be the duty of the safety officer to assist the supervisors in the initiation, education, and execution of an effective safety program generally and more specifically the following:

- Introduce the safety program to new employees.
- Follow up on recommendations, suggestions, etc., made at the monthly safety meetings. All topics of safety concerns shall be documented accordingly.
- Be thoroughly familiar with the company safety program and assist the personnel in the execution of standard policies.
- Conduct safety inspections on a periodical basis.
- Address all hazards or potential hazards as needed.
- The preparation of accident reports and investigations.
• Maintain adequate stock of first aid supplies and other safety equipment to ensure their immediate availability, and make sure there is adequate number of qualified first aid certified people on the job.
• Be thoroughly familiar with the OSHA, local, and state safety codes and regulations.

**Employees:**
It is the duty of each and every employee to know the safety rules, and conduct his work in compliance. Disregard of the safety and health rules shall be grounds for disciplinary action up to and including termination. It is the duty of each employee to make full use of the safeguards provided for their protection. Every employee will receive an orientation when hired and receive a copy of Bullhook Community Health Center, Inc. Occupational Health and Safety Plan. The following are some of the important components of the Plan:

• Read, understand and follow safety and health rules and procedures.
• Employees working in areas where there is a possible danger of injury Personal Protection Equipment (PPE) will be worn at all times.
• Suitable work clothes will be worn.
• Employees observed working in a manner that might cause injury to either themselves or other workers shall be warned of the danger and will immediately correct their method of operation.
• Employees shall report all injuries, no matter how slight to their supervisor immediately, and seek treatment promptly.
• Employees shall be aware of the location of first aid, fire fighting equipment, and other safety devices.
• Attend any and all required safety and health meetings.
• Until they are properly trained, employees are not to perform potentially hazardous tasks, or to use any hazardous material. Employees are to follow all procedures when performing those tasks.

**IF EVER IN DOUBT ABOUT SOMETHING, STOP, AND ASK SOMEONE**

**Supervisor**
Each supervisor will establish an operating atmosphere that insures that safety and health is managed in the same manner and with the same emphasis as production, cost, and quality control.

• Define the responsibilities for safety and health of all subordinates and hold each person accountable for their results through the formal appraisal system and where necessary, disciplinary procedures.
• Regularly emphasizing that accident and health hazard exposure prevention are not only moral responsibilities, but also a condition of employment. Accidents create unnecessary loss both personal and financial.
• Identifying operational oversights that could contribute to accidents that often result in injuries and property damage.
• Participate in safety and health related activities, including routinely attending safety meetings, reviews of the facility, correcting employee behavior that can result in accidents and injuries, and quality control problems.
• Spend some time with each person hired explaining the safety policies and the hazards of his/her particular work.
• Never short-cut safety for expediency, nor allow workers to do so.
• Enforce safety rules consistently, and follow company’s discipline/enforcement procedures.
• Conduct daily, job site walk through and correct noted safety violations.

**DISCIPLINE/ENFORCEMENT**

Violations of safety requirements will be handled in accordance with BCHC’s disciplinary policies.

**CONTROL OF HAZARDS**

Where feasible, workplace hazards are prevented by effective design of the job site or job. Where it is not feasible to eliminate such hazards, they must be controlled to prevent unsafe and unhealthy exposure. Once a potential hazard is recognized, the elimination or control must be done in a timely manner. These procedures should include measures such as the following:

• Using engineering techniques where feasible and appropriate.
• Provide for regular equipment maintenance to prevent breakdowns that can create hazards.
• Plan for emergencies, including fire and natural disasters, and drill everyone frequently enough so that if the real thing happens, everyone will know what to do even under stressful conditions.
• Using administrative controls, such as reducing the duration of exposure.
• Supervisors/Foreman shall maintain a periodic site inspection program.
• Establishing a medical program that includes first aid on site, as well as nearby physician and emergency medical care to reduce the risk of any injury or illness that occurs.
• Address any and all safety hazards to employees whenever one is observed.

**SAFETY COMMITTEE**

The Safety Committee shall consist of the entire clinic staff. Safety issues will be a part of the monthly staff meeting.

Safety discussions will include:

• Discuss safety policies and procedures and make recommendations for improvements.
• Review accident investigation reports on all accidents, incidents and "near-miss".
• Identify unsafe conditions and practices and plan for remedies.

**TRAINING AND EDUCATION**

Training is an essential component of an effective safety and health program. It addresses the responsibilities of both management and employees at the site. Training is often most effective when incorporated into other education on performance requirements and job practices.

Training programs should be provided as follows:

• Initially when the plan is developed
• For all new employees
• When new equipment, materials, or processes are introduced
• When procedures have been updated or revised
• When experiences/operations show that employee performance must be improved
• At least annually

Besides the standard training, employees should also be trained in the recognition of hazards. Be able to look at something or someone and know that there is a problem, a list may include:

Falls from- Slippery Floors, Tripping, Chairs

Electrical- Appliances, Damaged cords, Outlets, Overloads, Extension cords, Grounding, Switches

Housekeeping- Exits, Walkways, Floors, Trash, Storage of Materials (Hazardous and Non-Hazardous), Protruding Nails etc., Material laying on the floor

Fire- Oily-Dirty Rags, Combustibles, Fuel Gas Cylinders, Exits (blocked), means of egress not visibly marked, fire extinguishers not serviced, no smoking sign posted, safety cans being used

Trips/Slips- Un-even flooring, Electrical cords, icy walkways, carpeting, floor mats, spills

Health- Eye injury due to flying objects, Bloodborne Contaminates; aggressive patient

Employees trained in the recognition of hazards are less likely to be injured on the job. Training is not just for the worker, but for everyone.

All employees who are may be exposed to bloodborne pathogens as a part of their job responsibilities shall:
• Have hepatitis B vaccination made available to them;
• Have appropriate training on procedures to protect them from bloodborne pathogens, including universal precautions;
• Have available and understand how to use appropriate personal protective equipment (PPE) to protect against exposure.

RECORDKEEPING AND HAZARD ANALYSIS
If an injury or accident should ever occur, the involved or witness staff member shall report it to his/her supervisor as soon as possible. An Incident Report form shall be completed and turn in to the Safety Officer within 24 hours.

The Safety Officer will maintain a log and summary report for every recordable injury and illness. The entry should be done as soon as practicable, but no later than 6 working days after receiving information that a recordable injury or illness has occurred. The OSHA log No. 200 or equivalent shall be used for the recording.

A recordable injury or illness would be a fatality, loss of work or transfer to another job or termination of employment due to the incident, an incident requiring medical treatment (other than first aid) or involve loss of consciousness or restriction of work or motion. First Aid is any one-time treatment, and any follow-up visit for the purpose of observation, of minor scratches, cuts, burns, splinters, and so forth, which do not ordinarily require medical care.

The Safety Officer shall:
- Evaluate the incident log or OSHA 200 to determine trends or patterns in injuries in order to address hazards to which employees are exposed.
- Keep employee training records accessible for review by employees.

**ACCIDENT INVESTIGATION**

**Supervisors**
- Provide first aid, call for emergency medical care if required
- If further medical treatment is required, employee should be seen by provider.
- Secure area, equipment and personnel from injury and further damage.
- Investigate the incident(injury)--gather facts, employee and witness statements; take pictures and physical measurements of incident site and equipment involved, when appropriate.
- Complete an incident form within 24 hours and turn it in to the Safety Officer.
- If the injury warrants time away from work, insure that the absence is authorized by a provider and that you maintain contact with your employee while he/she remains off work.
- Insure that corrective action to prevent a recurrence is taken.
- Discuss incident, where appropriate, in safety meetings with the intent to prevent a recurrence.
- Monitor status of employee(s) off work, maintain contact with employee and encourage return to work even if restrictions are required by the physician.
- When injured employee(s) return to work they should not be allowed to return to work without "return to work" release forms from the physician. Review the release carefully and insure that the employee follows the restrictions indicated by the physician.

**SAFETY RULES AND PROCEDURES**

- No employee is expected to undertake a job until that person has received adequate training.
- All employees shall be trained on potential hazards that they could be exposed to and how to protect themselves.
• No employee is required to work under conditions which are unsanitary, dangerous or hazardous to their health.
• Only qualified trained personal are permitted to operate machinery or equipment.
• All injuries must be reported to your supervisor.
• Manufacture's specifications, limitations, and instructions shall be followed.
• Particular attention should be given to new employees and to employees moving to new jobs or doing non-routine tasks.
• All OSHA posters shall be posted.
• Emergency numbers shall be posted and reviewed with employees.
• Employees working in areas where there is a possible exposure to bloodborne pathogens shall be protected by Personal Protection Equipment (PPE).
• All equipment, whether furnished by the employer or the employee, shall be maintained in a safe condition.
• All materials stored in tiers shall be stacked, racked, blocked, interlocked, or otherwise secured to prevent sliding, falling or collapse.
• The employer shall ensure that electrical equipment is free from recognized hazards that are likely to cause death or serious physical harm to employees.
• All places of employment shall be kept clean, the floor of every workroom shall be maintained, so far as practicable, in a dry condition; standing water shall be removed. Where wet processes are used, drainage shall be maintained and false floors, platforms, mats or other dry standing places or appropriate waterproof footgear shall be provided.
• To facilitate cleaning, every floor, working place, and passageway shall be kept free from protruding nails, splinters, loose boards, and holes and openings.

EMPLOYEE WORKPLACE RIGHTS

The law encourages workers to be active players in their workplace’s safety and health effort. Employee rights shall be displayed on an OSHA poster in a place accessible to all employees. In addition, the Safety Officer will maintain OSHA Standard 3021-08R2003, “Employee Workplace Rights” and make it available for review by any interested employee.

HEALTH AND SAFETY PLANS

Supplemental plans and policies will be developed to cover:

• Infection Control/Infectious Diseases
• Workplace Violence Prevention
• Hazardous Materials
• Community Disasters and Fire Evacuation
• Exposure to Bloodborne Pathogens
• Ionizing Radiation
• Incident Reporting