

## **RESPONSIBILITY**

BrightStar considers both safety and security a key concern and focus. It is critical that every employee takes responsibility concerning safety and security. It is our policy that accident prevention shall be considered of primary importance in all phases of our operation and administration.

It is the intention of BrightStar's management to provide safe and healthy working conditions and to establish and insist upon safe practices at all times by all employees. Federal and State Occupational Safety and Health Acts and good safety practice require that all employers provide safe and healthy working conditions for all of their employees. Brightstar is committed to ensuring that our employees are assigned to work that is free of unsafe working conditions and/or hazards.

Our primary goal is to achieve the greatest degree of freedom from accidents and to provide a safe and healthy working environment. Failure to follow BrightStar's safety guidelines and/or failure to heed any client's job-site safety rules may result in disciplinary action up to and including termination. The precautionary measures in this guide require every employee's complete cooperation. All managers, supervisors and lead personnel are responsible for implementing and maintaining the IIPP in their work areas and for answering worker questions about the Program. A copy of this IIPP is available in the Employee Portal ([www.BrightStarCare.com](http://www.BrightStarCare.com) or [www.SFCareTeam.com](http://www.SFCareTeam.com)), in the office at 150 Shoreline Hwy, B28, Mill Valley, CA.

## **COMPLIANCE**

Management is responsible for ensuring that all safety and health policies and procedures are clearly communicated and understood by all employees. Supervisors and lead personnel are expected to enforce the rules fairly and uniformly. All employees are responsible for using safe work practices, for following all directives, policies and procedures, and for assisting in maintaining a safe work environment.

The following is our system of ensuring that all workers comply with the rules and maintain a safe work environment:

- ☐ Informing workers of the provisions of our IIPP;
- ☐ Evaluating the safety performance of all workers;
- ☐ Recognizing employees who perform safe and healthful work practices.
  - This recognition is accomplished by monthly newsletter announcement and office posting;
- ☐ Providing training to workers whose safety performance is deficient;
- ☐ Disciplining workers for failure to comply with safe and healthful work practices.
  - The following outlines our disciplinary process :
    - 1 violation will require a knowledge retest and evaluation
    - 2<sup>nd</sup> violation will include a written warning retest / evaluation
    - 3<sup>rd</sup> violation will include a written warning and administrative leave

- 4<sup>th</sup> violation will require termination
- ☐ Other means that we use to ensure employee compliance with safe and healthful work practices include:
  - Supervisory visits and applicable safety evaluations
  - Periodic knowledge testing for job specific safety knowledge

## **COMMUNICATION**

The following is our system of communication, designed to facilitate a continuous flow of two-way (management, supervision and employees) safety and health information in a form that is readily understandable to and between all affected site personnel:

- ☐ New worker orientation, including a discussion of site-specific safety and health policies and procedures.
- ☐ Follow-through by supervision to ensure effectiveness.
- ☐ Workplace-specific safety and health training.
- ☐ Safety meetings held at least every quarter – more frequently as deemed necessary by the creation of hazards or occurrence of injuries and illnesses.
- ☐ Effective written communication of safety and health concerns between workers and supervisors, including language translation where appropriate. ☐
- ☐ Posted and distributed safety information.
- ☐ A system for workers to anonymously inform management about workplace hazards without fear of reprisal. This is accommodated by web-feedback form or written feedback form .

Other means we use to ensure communication with employees include:

- Periodic safety conference calls
- On-demand web resources available Team Resource Portal
- Job Specific Safety Sheets in each Care Binder
- Payroll statement notifications
- Periodic supervisory visits
- ☐ General safe work practices with specifics with respect to hazards unique to the employees' job assignment.

## **HAZARD ASSESSMENT**

Periodic inspections to identify and evaluate workplace hazards shall be performed by Supervising Nurses and Home Health Specialists according to the following schedule:

- ☐ When our Injury and Illness Prevention Program was first established
- ☐ Prior to starting in-home care services

- ☐ When new substances, processes, procedures or equipment that present potential new hazards are introduced into our workplace;
- ☐ When new, previously unidentified hazards are recognized;
- ☐ When occupational injuries and illnesses occur;
- ☐ When we hire and/or reassign permanent or intermittent workers to processes, operations, or tasks for which a hazard evaluation has not been previously conducted; and
- ☐ Whenever workplace conditions warrant an inspection.

Periodic inspections consist of identification and evaluation of workplace hazards utilizing applicable sections of the attached Home Safety Checklist, and any other effective methods to identify and evaluate workplace hazards.

### **ACCIDENT/EXPOSURE INVESTIGATIONS**

Investigation of workplace accidents, hazardous substance exposures and near-accidents will be done by Supervising Nurse, Home Health Specialist, Director of Clinical Services or the Administrator, and will include:

- ☐ Visiting the scene as soon as possible;
- ☐ Interviewing affected workers and witnesses;
- ☐ Examining the workplace for factors associated with the accident/exposure/near-accident;
- ☐ Determining the causes of the accident/exposure/near-accident;
- ☐ Taking corrective action to prevent the accident/exposure/near-accident from reoccurring; and
- ☐ Recording the findings and corrective actions taken on the attached OSHA Form 301. HAZARD CORRECTION Unsafe or unhealthy work conditions, practices or procedures at our work facilities shall be corrected in a timely manner based on the severity of the hazards, and according to the following procedures:
  - ☐ When observed or discovered;
  - ☐ All such actions taken and dates they are completed shall be documented on the attached Identified Hazards and Correction Record

### **TRAINING AND INSTRUCTION**

All workers, including management, supervisors, and lead personnel shall have training and instruction on general and job-specific safety and health practices. Training and instruction shall be provided as follows:

- ☐ When the IIPP is first established;
- ☐ To all new workers;
- ☐ To all workers given new job assignments for which training has not previously provided;
- ☐ Whenever new substances, processes, procedures or equipment or patient conditions are introduced to the workplace and represent a new hazard;
- ☐ Whenever we become aware of a new or previously unrecognized hazard;

- ☐ To supervisors to familiarize them with the safety and health hazards to which workers under their immediate direction and control may be exposed; and
- ☐ To all workers with respect to hazards specific to each employee's job assignment.

This training will include (but is no limited to):

- ☐ Explanation of our IIPP, emergency action plan and fire prevention plan, and measures for reporting any unsafe conditions, work practices, injuries and when additional instruction is needed.
- ☐ Availability of hand washing supplies, equipment and sanitizing products
- ☐ Provisions for medical services and first aid, including emergency procedures.
- ☐ Proper housekeeping , eliminating tripping hazards and keeping pathways clear
- ☐ Proper food handling practices
- ☐ Preventing workplace violence

Where applicable our training may also include:

- ☐ Prevention of musculoskeletal disorders, including proper lifting techniques
- ☐ Use of personal protective equipment. ☐
- ☐ Information about chemical hazards to which employees could be exposed and other hazard communication program information.
- ☐ Proper food and beverage storage to prevent them from becoming contaminated

In addition, we provide specific instructions to all workers regarding hazards unique to their job assignment, to the extent that such information was not already covered in other training.

## **RECORDKEEPING**

Written IIPP and Documentation Requirements

Our organization has taken the following steps to implement and maintain our IIPP:

Our organization has ten or more employees and keeps records as follows:

1. Records of scheduled and periodic inspections including the person(s) conducting the inspection, the workplace hazards (i.e., unsafe conditions and work practices that have been identified) and the action(s) taken to correct the identified unsafe conditions and work practices, are recorded on the Home Safety Checklist and the Investigation / Corrective Action Report\*. These records are maintained for at least one (1) year.
2. Documentation of safety and health training for each worker, including the worker's name or other identifier, training dates, type(s) of training, and training providers are recorded on the Worker Training and Instruction Record\*. This documentation is maintained for at least one (1) year.

All BrightStar employees must comply with the following requirements:

- Learn and understand the safe practices for the general work area and for your job.
- Comply with the client's safe work practices and personal protective equipment requirements for your job.
- Report all unsafe work conditions to your on-site supervisor and BrightStar Staffing Coordinator immediately.
- Notify your Staffing Coordinator of any changes in your job duties that differ from the ones you were sent to perform at the client location.

Under BrightStar's Safety and Security policy all employees have the following rights and responsibilities:

- To be advised of occupational safety and health hazards and to receive training about safe work conditions, practices and personal protective equipment. Job-site safety training will generally be handled by the client to whom you have been assigned.
- To provide information to BrightStar about safety hazards or concerns, and to request information or make safety suggestions without fear of reprisal.

### **General Safety Rules**

To reduce the risk of accidents in the workplace, the following general safety rules and procedures are preventative measures to be observed by all personnel.

The observance of these safety rules and procedures will help you perform your job safely and help maintain safe working conditions. All employees should familiarize themselves with these safety rules, which are company policy. Your compliance with the General Safety Rules listed below will assist us in achieving our objective of ensuring a safe work environment. These rules are the minimum guidelines for working safely. It is your duty to be aware and apply safe work habits while on the job.

If you are asked to perform duties that are different from what was described to you at the job-site, call your Staffing Coordinator immediately. Employees should not change duties without BrightStar's knowledge and approval.

### **Employee Safety Participation and Responsibility**

It is every employee's responsibility to follow BrightStar's safety rules and procedures, as well as all of the client's job-site safety rules and procedures. These include:

- Knowing your job responsibilities and always following job-site safety rules and safe work practices.
- Recognizing the hazards that may be present on the job and taking precautions to ensure the safety of yourself and others.
- Informing the client and BrightStar of observed safety hazards and offering recommendations to improve safety.
- Actively participating and cooperating in the overall safety program of BrightStar and the client.
- Using all personal protective equipment provided by BrightStar and/or the client.

- **In the event of an injury, reporting it immediately to BrightStar (no later than 1 hour from time of occurrence).**
- Using the worksite first-aid facilities when available and practical.

All BrightStar employees are encouraged to provide first-hand information to the Staffing Coordinator about any safety concerns they may have relating to the job-sites to which they have been assigned.

#### **Office Safety Rules**

- Understand job expectations and follow client safety rules, procedures and instructions. If you do not know the safest way to do the job, ask your job-site supervisor.
- Ergonomics -Adjust work stations to your personal needs (chair, keyboard, etc.)
- Be familiar with emergency exits and evacuation procedures.
- Do not stand on chairs, tables, boxes or desks to obtain articles that may be out of reach; instead always ask for assistance.
- Use handrails to give support and balance when ascending or descending steps or stairs. Walk; do not run, in halls, rooms, passageways or on steps/stairs. Always keep to the right and approach corridor intersections carefully. Open doors slowly using the handle or push plate. Do not enter rooms or stairways that are not properly lit.
- Practice good housekeeping by keeping your work area clean and orderly. Keep aisles and passageways open and uncluttered.

Report all unsafe conditions to your job-site supervisor immediately. This includes spills, broken furniture, broken glass and defective equipment.