**PURPOSE:**

The purpose of this program is to provide guidance to office managers and office staff on the elements of safe office work. The office is like any other work environment in that it may present potential health and safety hazards. Most of these, however, may be minimized or eliminated by designing jobs and workplaces properly, and by taking into account differences among tasks and individuals.  Inadequate environmental conditions, such as noise, temperature, and humidity, may cause temporary discomforts. Environmental pollutants such as chemical vapors released from new carpeting and furniture may also induce discomforts.

**1.0 RESPONSIBILITIES:**

1.1 Management provide training for all office staff

● Electrical Safety

● Emergency Procedures

● Office Ergonomics

1.2 Office Staff

● Report all safety related concerns immediately

● Do not attempt to repair any office equipment or systems Electrical Safety

● Maintain a neat and sanitary office environment

**2.0 ELECTRICAL SAFETY:**

Electric cords should be examined on a routine basis for fraying and exposed wiring. Particular attention should be paid to connections behind furniture, since files and bookcases may be pushed tightly against electric outlets, severely bending the cord at the plug. Electrical appliances must be designed and used in accordance with UL requirements.

2.1 Use of Extension Cords

● Extension cords shall only be used in situations where fixed wiring is not feasible.

● Extension cords shall be kept in good repair, free from defects in their insulation.

● Extension cords shall not be kinked, knotted, abraded, or cut.

● Extension cords shall be placed so they do not present a tripping or slipping hazard.

● Extension cords shall not be placed through doorways having doors that can be closed, and thereby damage the cord.

● All extension cords shall be of the grounding type (three conductor)

**3.0 HOUSEKEEPING:**

Good housekeeping is an important element of accident prevention in offices.

Poor housekeeping may lead to fires, injuries to personnel, or unhealthful working conditions. Mishaps caused by dropping heavy cartons and other related office equipment and supplies could also be a source of serious injuries to personnel.

Passageways in offices should be free and clear of obstructions. Proper layout, spacing, and arrangement of equipment, furniture, and machinery are essential.

All aisles within the office should be clearly defined and kept free of obstructions.

Chairs, files, bookcases and desks must be replaced or repaired if they become damaged. Damaged chairs can be especially hazardous. Filing cabinet drawers should always be kept closed when not in use. Heavy files should be placed in the bottom file drawers.

Materials stored within supply rooms must be neatly stacked and readily reached by adequate aisles. Care should be taken to stack materials so they will not topple over. Under no circumstances will materials be stacked within 18 inches of ceiling fire sprinkler heads or Halon nozzles. Materials shall not be stored so that they project into aisles or passageways in a manner that could cause persons to trip or could hinder emergency evacuation.

**4.0 COMPUTER WORK STATIONS**

Complaints concerning musculoskeletal problems are frequently heard from computer operators. Most common are complaints relating to the neck, shoulders, and back. Others concern the arms and hands and occasionally the legs.

Certain common characteristics of VDT jobs have been identified and associated with increased risk of musculoskeletal problems. These include:

* Design of the workstation.
* Nature of the task.
* Repetitiveness of the job.
* Degree of postural constraint.
* Work pace.
* Work/rest schedules.
* Personal attributes of individual workers.

The key to comfort is in maintaining the body in a relaxed, natural position. The ideal work position is to have the arms hanging relaxed from the shoulders. If a keyboard is used, arms should be bent at right angles at the elbow, with the hands held in a straight line with forearms and elbows close to the body. The head should be in line with the body and slightly forward.

**5.0 DISPLAY SCREENS**

When work is conducted at a computer, the top of the display screen should be at, or just slightly below, eye level. This allows the eyes to view the screen at a comfortable level, without having to tilt the head or move the back muscles.

Control glare at the source whenever possible; place VDTs so that they are parallel to direct sources of light such as windows and overhead lights, and use window treatments if necessary. When glare sources cannot be removed, seek appropriate screen treatments such as glare filters. Keep the screen clean.

**5.0 YOUR CHAIR**

The chair is usually the most important piece of furniture that affects user comfort in the office. The chair should be adjusted for comfort, making sure the back is supported and that the seat pan is at a height so that the thighs are horizontal and feet are flat on the floor. An ergonomically sound chair requires four degrees of freedom - seat pan tilt, backrest angle, seat height, and backrest height. Operators can then vary the chair adjustments according to the task. In general, chairs with the most easily adjustable dimensions permit the most flexibility to support people's preferred sitting postures.

Armrests on chairs are recommended for most office work except where they interfere with the task. Resting arms on armrests is a very effective way to reduce arm discomforts. Armrests should be sufficiently short and low to allow workers to get close enough to their work surfaces, especially for tasks that require fixed arm postures above the work surface.

**6.0 WORKING HEIGHT**

The work surface height should fit the task. The principle is to place the surface height where the work may be performed in such a manner as to keep arms low and close to the body in relation to the task. If the working height is too high, the shoulders or the upper arms have to be lifted to compensate, which may lead to painful symptoms and cramps at the level of the neck and shoulders. If, on the other hand, the working height is too low, the back must be excessively bowed, which may cause backache. Generally, work should be done at about elbow height, whether sitting or standing.

**7.0 WORK / REST SCHEDULES**

One solution for stress and fatigue is to design the computer operator's work so that tasks requiring concentrated work at the terminal are alternated with non-computer based tasks throughout the workday. Also, a short break (5-10 minutes) should be taken at least once each hour when involved in continuous work at the computer.

**8.0 OFFICE LIGHTING**

Different tasks require different levels of lighting. Areas, in which intricate work is performed, for example, require greater illumination than warehouses. Lighting needs vary from time to time and person to person as well. One approach is to use adjustable task lighting that can provide needed illumination without increasing general lighting.

Task lamps are very effective to supplement the general office light levels for those who require or prefer additional light. Some task lamps permit several light levels. Since task lamps are controlled by the individual, they can accommodate personal preferences.

**9.0 INDOOR AIR QUALITY**

Indoor air quality (IAQ) is an increasingly important issue in the work environment. The study of indoor air quality and pollutant levels within office environments is a complex problem. The complexity of studying and measuring the quality of office environments arises from various factors including:

* Office building floor plans are frequently changing to accommodate increasingly more employees and reorganization.
* Office buildings frequently undergo building renovations such as installation of new carpet, modular office partitions and free-standing offices, and painting.
* Many of the health symptoms appearing are vague and common both to the office and home environment.
* In general, very little data on pollutant levels within office environments is available.
* Guidelines or standards for permissible personal exposure limits to pollutants within office buildings are very limited.

Many times odors are associated with chemical contaminants from inside or outside the office space, or from the building fabric. This is particularly noticeable following building renovation or installation of new carpeting. Outgassing from such things as paints, adhesives, sealants, office furniture, carpeting, and vinyl wall coverings is the source of a variety of irritant compounds. In most cases, these chemical contaminants can be measured at levels above ambient (normal background) but far below any existing occupational evaluation criteria.

**10.0 WASTE DISPOSAL**

Office personnel should carefully handle and properly dispose of hazardous materials, such as broken glass. A waste receptacle containing broken glass or other hazardous material should be labeled to warn maintenance personnel of the potential hazard.

**11.0 EMERGENCY ACTION PLAN**

Emergency Action Plans are designed to control events and minimize the effects. Through careful pre-planning, establishment of Emergency Action Teams, training and drills, employees can be safeguarded and potential for damage to Company assets minimized.

Emergency Action Plans include:

1. Exits routes, meeting areas and employee accounting

2. Emergency evacuation, incident command and notification to emergency services

3. Personal injury and property damage

4. Protection of Company information, both hard copy and electronic media

5. Bomb threats and facility security

6. First Aid Response

7. Use of fire extinguishers

The following is a list of the criteria that will be used to determine whether an accident should be reported. An accident meeting any one of the criteria shall be determined by the Safety Director if an investigation is needed.

**Quantity of Hazardous Material Spilled or Released:** All Accidents involving Hazardous Chemicals will be reported to the Safety Director or Project Manager.

**Property Damage:** All Accidents involving property damage will be reported to the Safety Director or Project Manager, regardless of dollar value.

**Fire or Explosion:** Any reported fire or explosion involving hazardous chemicals will be reported to Safety Director or Project Manager.

**Injuries or Deaths:** All injury and death Accidents will be reported to Safety Director or Project Manager.

**REFERENCES:**

A) 29 CFR 1910.119 Process Safety Management of Highly Hazardous Chemicals; Explosives and Blasting Agents, Paragraph (m).

B) 29 CFR 1904.8 Reporting of Fatality or Multiple Hospitalization Accidents.

C) 40 CFR Part 68 Accidental Release Prevention Requirements: Risk Management Programs Under the Clean Air Act, Section 112(r)(7), Paragraph 68.81 Accident Investigation.

(D) 29 CFR Part1926--Safety and Health Regulations for Construction

**PROCEDURES:**

The Accident investigation procedures that shall be followed can be outlined by the following major steps:

 **1.0 INITIAL ACCIDENT RESPONSE**

 **2.0 ESTABLISH INVESTIGATION TEAM**

 **3.0 DETERMINE THE FACTS**

 **4.0 DETERMINE THE CAUSE**

 **5.0 RECOMMEND CORRECTIVE AND PREVENTIVE ACTIONS**

 **6.0 COMMUNICATE RESULTS/FOLLOW-UP**

Specific procedures to be followed within each of these major steps are provided.

**1.0 INITIAL ACCIDENT RESPONSE**

1.1 The relative priority of response to a serious accident shall be:

1.1.1 Providing medical and other safety and health assistance to personnel;

1.1.2 Bringing the accident under control; and,

1.1.3 Report the accident within 1 hour to the Safety Director or Project Manager.

1.1.4 Directing activities related to the investigation in a way that preserves relevant information and evidence.

1.2 Activities to preserve information shall include:

1.2.1 Securing and barricading the scene when appropriate,

1.2.2 Initiating the collection of transient information,

1.2.3 Preliminary interviewing of witnesses and personnel, etc.

1.3 A key element of this phase of the process is to get an accurate list of witnesses of all kinds that will need to be interviewed in greater detail by the investigation team. Another important part of the initial response is to take photographs which may prove useful as the investigation continues. This is critical if the scene must be disturbed before the investigation team can complete its review.

1.4 Responsibility for this early phase of Accident response should rest with the Safety Director or his designee. The only time the Safety Director will not lead an Accident Investigation is when the Safety Director is unavailable. (Vacation, sick, etc.)

**2.0 ACCIDENT INVESTIGATION TEAM**

2.1 Timing is of the essence in forming the investigation team. OSHA regulations require the team to begin its investigation within 48 hours of the Accident [OSHA 29 CFR 1910.119 (m)(2)]. Wagner-Meinert, LLC will start the investigation process as soon as it is reported.

2.2 The Safety Director or designee is responsible for notifying the Accident Investigation Team members. The Team will consist of the following:

 2.2.1 Safety Director or designee – Team Leader

 2.2.2 Project Manager

 2.2.3 Foreman

 2.2.4 Neutral Office Employee

The exact membership of the Team will be dependent upon severity and circumstances surrounding the accident.

2.3 The Team Leader's duties may include:

2.3.1 Controlling the scope of team activities by identifying which lines of investigation should be pursued, referred to another group for study or deferred;

2.3.2 Calling and presiding over meetings;

2.3.3 Assigning tasks and establishing timetables;

2.3.4 Ensuring that no potentially useful data source is overlooked; and,

2.3.5 Keeping management advised of the progress of the investigation.

2.4 The Team Leader is responsible for ensuring that the Team has full access to the site, document files and to all employees who may have input to the investigation process. The Team Leader shall issue and post a notice on plant bulletin boards to the effect that an Investigation Team has been formed along with a listing of the Team members. Any employees feeling they have useful information shall be encouraged to contact the Team.

**3.0 DETERMINE THE FACTS**

3.1 A prompt and comprehensive search for facts surrounding the Accident is the first major undertaking of the Team. The Team shall conduct the following types of activities as it performs its fact-finding function.

3.2 Team members should visit the accident scene before physical evidence has been disturbed. The Team Leader is responsible for ensuring that the team is not subjecting itself to any dangers as the visit is conducted. Personal safety of the team members shall take priority over the Accident investigation process at all times. No team member shall be forced to take any actions, which they feel could endanger their safety.

3.3 Team members shall first review the scene individually, discuss their preliminary findings, and then repeat the process as a group with the Safety Director preparing a written log of observations and important comments. Some of the things that shall be noted during the scene visit are:

3.3.1 Indication of any unusual activities in the area (welding or cutting equipment, tools, motorized equipment, etc.).

3.3.2 Status of safety equipment in area (Was equipment used? Was it readily available? Any indications of safety equipment problems?).

3.3.3 Note positions of important valves and controls that could have contributed to the Accident or which may have been used to control the Accident.

3.3.4 Note any indications of fire or explosion damage and whether any

3.3.5 Note whether vessels, piping, etc. in the area were properly labeled and identified

3.4 The Team shall prepare visual aids such as photographs, sketches and graphical representations of information that may be useful during the investigation.

3.5 The Team shall take brief statements from any eyewitnesses who are available during the inspection of the scene. More detailed interviews should be arranged later. Avoid having several eyewitnesses share their impressions of the Accident so as to avoid undue influence of an eyewitness who may have a differing view of the Accident.

3.6 The Team shall determine whether any key mechanical equipment should be disassembled and should then observe such disassembly and record findings. Any equipment which may have failed or otherwise may have contributed to the Accident should be preserved and/or carefully documented.

3.7 The Team shall review all sources of potentially useful information such as as-built drawings, operating logs, records, charts, previous reports, standard and emergency procedures, equipment manuals, oral instructions, change records, training and performance records of employees, laboratory tests, etc.

3.8 The Team shall carefully document all sources of information gathered during the fact-finding process.

**4.0 DETERMINE THE CAUSE**

4.1 Establishing the cause of the accident is crucial to the development of effective recommendations to correct and prevent a recurrence.

4.2 It is also important that the true "root" cause of the accident, as well as contributing causes be identified. A recommended procedure for determining cause(s) of the accident follows:

4.3 The Team shall develop the "chronology of events" which occurred before, during and after the accident.

4.4 The Team shall identify any and all conditions or circumstances which deviated from normal, no matter how insignificant they may seem.

4.5 As a Team, strive to agree on the most likely root cause(s) and secondary cause(s). (Reference the standard lists of contributing causes contained on the Accident Investigation Report Form) (Section 01A).

**5.0 RECOMMEND CORRECTIVE AND PREVENTIVE ACTIONS**

5.1 During the "determination of the cause" process, some actions may surface that could have eliminated or reduced the chances for the Accident having occurred. In some cases, these recommendations may not relate to the most likely cause but may still be an appropriate recommendation to improve the safety of the process.

5.2 The Team shall formalize these recommendations in two distinct areas. Engineering changes should encompass those actions which include physical changes to the system hardware. Administrative changes should include procedural changes, training, etc.

5.3 The Team shall assess the urgency of implementing the corrective and preventive actions. If changes should be made prior to resumption of operations that should be clearly stated in the recommendations. Otherwise an approximate time frame for implementation of the changes should be included with each recommendation.

**6.0 COMMUNICATING RESULTS/FOLLOW-UP**

6.1 Communicating results fall into three distinct areas. First is the completion of the standard Accident Investigation Report Forms which shall be used in all cases requiring accident investigation. Second is the requirement that the results of the investigation be reviewed with appropriate personnel whose work assignments were affected or could have been affected by the accident or one like it. Third is the issuance of Team status reports and follow-up reports.

6.2 A sample, standard Accident Investigation Report Form for accidents has been developed. The forms and instructions for use are included in subsequent appendixes of this program.

6.3 Within two weeks of the completion of investigation the Team Leader shall arrange for one or more review sessions with affected employees. The purpose of the meeting is to explain the outcome of the investigation. The Team, as part of its work, shall have developed a list of affected individuals (by name or job description) who shall be involved in the review process. The Team should consider accident circumstances in determining who the "affected employees" are. The Safety Director shall ensure that all appropriate affected personnel are in attendance at a review session. Minutes of review sessions shall include the names of all individuals in attendance as well as any major issues that were raised during the review.

6.4 If job site customer requires a copy of an Accident Investigation report. The Safety Director will contact customer for that determination.

**DOCUMENT MANAGEMENT:**

There are several documents that serve an important function within the Accident Investigation Program. Management of documents within the overall Process Safety Management Program is important. The following guidelines shall be followed in order to avoid excessive paperwork but yet ensure the proper functionality of the documents.

The following are the documents that will typically be associated with an Accident investigation, along with suggested filing and distribution paths:

Investigation Team Working and Support Documents:

Team Leader shall maintain the Team file during the investigation. Individual members of the team shall ensure that a copy of any important document, photo, etc. is in the Team file. At the close of the Team's work the file should be completely assembled in the one Team file or series of files and shall be clearly marked that it must be forwarded to the Safety Director and saved for five years.

 Copies are then made and documents are distributed as follows:

Original – Safety Director – original to be maintained for 5 years

Copies – Project Manager – copy to be maintained for 2 years

**CHANGE CONTROL:**

All management system changes are reviewed, approved or disapproved by the Safety Committee.

**PERSONNEL:**

The Owners have the ultimate responsibility for the Accident Investigation Program. They have designated the Safety Director to manage the Accident Investigation Program. The Safety Director determines whether an accident requires investigation and establishes the Team Leader and Team Membership.

| **Revision / Review History** |
| --- |
| **Revision** | **Date** | **Authorized By** | **Changes** |
| 1 | 9/11/2000 | Safety Director | New Program |
| 1 | 1/15/2001 | Safety Director | Annual Review |
| 1 | 1/10/2002 | Safety Director | Annual Review |
| 1 | 1/11/2003 | Safety Director | Annual Review |
| 1 | 1/15/2004 | Safety Director | Annual Review |
| 1 | 1/10/2005 | Safety Director | Annual Review |
| 1 | 6/27/2006 | Safety Director | Annual Review |
| 1 | 9/6/2007 | Safety Director | Annual Review |
| 1 | 8/23/2010 | Safety Director | Annual Review |
| 1 | 10/3/2012 | Safety Director | Annual Review |
| 1 | 11/10/2012 | Safety Director | Annual Review |
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| 2 | 6/13/2016 | Safety Director | Annual Review-Updated and new format |
| 2 | 6/30/2017 | Safety Director | Annual Review |
| 2 | 12/18/2018 | Safety Director | Annual Review |
| 2 | 6/10/2019 | Safety Director | Annual review |
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