

ABM Safety Program Model



ABM Industries

INJURY AND ILLNESS PREVENTION PROGRAM

2/23/2013



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**ABM Industries, Inc.
Injury & Illness Prevention Program
(I2P2)**

Enterprise Safety Policy

It is the policy of ABM Industries to work continually toward improving our safety expectations, process and procedures with the goal evolving our safety culture.

It is the ABM’s intent to provide a safe working environment in all areas, for all employees. Accidents and injuries are prevented by proactively controlling the work environment and the actions of employees. Therefore, safety will take precedence in all areas of our business operations practices through the evaluation, planning and execution of injury prevention measures at all client sites. Every attempt will be made to reduce the possibility of accident occurrence. Protection of employees, the public, and company property and operations is paramount. We consider no phase of our operations more important than the health and safety of our employees.

Safe work and safe driving practices on the part of the employees must be part of all operations at our client sites. Employees must understand their personal responsibility for the prevention of injuries and be held accountable for working in a safe manner. Management teams must treat safety as a core value and coordinate hazard assessment, adequate resources and specific injury prevention efforts at their client sites. Accident prevention and efficient production go hand in hand. ABM maintains that all workplace injuries can and should be prevented.

The ABM Injury and Illness Prevention Program (henceforth referred to as the “I2P2”) sets the expectations for safety across the enterprise. ABM management and our operations teams will continue to be guided and motivated by this policy and, with the cooperation of all employees, will actively pursue a safer working environment.

Henrik Slipsager (President/CEO): _____

Date _____



LEADERSHIP

Purpose

ABM is committed to the safety and health of our employees, and understands that our strength as a company is only as good as the strength of each individual. We will strive to place safety and health above all else, and will involve all workers at every level in establishing a culture of safety. This written Injury Illness Prevention Program (I2P2) provides the framework from which we execute our safety policies and procedures. These policies and procedures are designed to help prevent and/or reduce the likelihood of job-related injuries and illnesses. It is our intent to comply with the requirements of each State and/or Federal OSHA General Industry Safety Orders in addition to fulfilling our “Safety Mission” as stated below.

Safety Absolutes

ABM considers six workplace hazards to be *critical* threats to our employees. These hazards are known to be common causes of serious injury or death, and proactively identifying and controlling them are part of ABM’s safety culture. In this regard, ABM has established the following *6 Safety Absolutes*:

- We will not conduct work on live electrical systems (only ABM-authorized employees will be permitted to conduct work on these systems after following proper lockout/tagout procedures)
- We will follow lockout/tagout procedures on any work that involves mechanical, hydraulic, chemical and electrical systems
- We will follow confined space entry procedures prior to conducting work in confined spaces
- We will ensure proper guards/railings or the use of fall arrest systems when working at elevated heights
- We will use all required personal protective equipment as prescribed for our work tasks
- We will use seatbelts and only hands-free communication devices when operating motorized vehicles (shuttle/bus/3rd party transport vehicles will not use any communication devices other than those used for dispatch)

Our *6 Safety Absolutes* are mandatory and we encourage reporting of non-compliance. All reports will be investigated and may result in discipline, up to and including termination. This standard is applicable to all ABM’s operations. Employees of contractors or subcontractors may be removed from an ABM client site and disqualified from future work.

Safety Mission

ABM is committed to:

- Providing moral leadership; placing the well-being of our employees, clients, their guests and the environment at the center of our thinking.
- Contributing to fiscal responsibility; reducing accident and related expenses to help enhance margins.
- Enhancing our competitive advantage; learning from accidents and aligning safety with quality & customer service – setting an industry standard.
- Ensuring regulatory compliance; exceeding government and industry minimum standards.



Leadership Responsibility & Commitment

The **Corporate Director of Safety** has the authority and responsibility for implementing the provisions of the I2P2 for ABM Industries. The Director of Safety reports to the **ABM’s Risk Manager**.

All Service Line Presidents, Regional Leaders, Branch Managers and Client/Project Managers are responsible for implementing and maintaining the I2P2 for their Service Lines and for answering questions about ABM’s I2P2 from employees. A copy of ABM Enterprise I2P2 is available at the Risk Management corporate office in Atlanta, Georgia, and each Service Line’s I2P2 is available at all Service Line corporate offices as well as being hosted on the ABM’s intranet portal.

ABM leadership throughout the enterprise is responsible for:

- Providing moral leadership for safety: placing the well-being of our employees, their guests and the environment at the center of our thinking
- Contributing to fiscal responsibility: reducing accident and related expenses to help enhance our margins
- Enhancing our competitive advantage: learning from accidents and aligning safety with quality and service excellence to help set an industry standard
- Ensuring regulatory compliance: exceeding government and industry minimum standards

Development of Safety Objectives

Enterprise and Service Line Safety leaders will develop and align safety objectives which define a process to prioritize and address the most significant safety-related exposures to ABM’s operations. Objectives will be adopted by each Service Line and reviewed as needed based on changes in core operations, emerging hazards in client market segments, newly enacted regulatory compliance requirements or other hazards as identified by ABM’s safety leadership team. Objectives will be designed to give ABM’s Service Line and Executive leadership teams a clear view of the ABM’s safety vision and targets, along with the steps needed to achieve these goals. Objectives will be specific, quantifiable and measurable to provide a framework for gauging the ABM’s safety program success.

Legal and Other Requirements

Legal and other external requirements are to be researched by the safety leadership team, in partnership with ABM’s legal team, to determine which requirements affect ABM’s operations. Written compliance plans will be developed as needed to assure that all required actions are taken in a timely and appropriate manner. These compliance plans will be addendums to each Service Line’s I2P2. The ABM Safety team will routinely monitor changes in legal/regulatory requirements to help assure that all new requirements are observed.

Safety Disciplinary Process

Employees are expected to fully comply with all safety rules and safe work procedures. The I2P2 cannot define every safety rule associated with a particular facility, location or worksite. These rules include but are not limited to the safe operation of company vehicles, wearing personal protective equipment while performing specific job functions, avoiding horseplay while at work or any threat of violence in the workplace. Any violation of these rules or procedures is considered an issue for progressive discipline.



Compliance

ABM’s Executive leadership team and the Corporate Director of Safety are responsible for ensuring that ABM is in compliance with all regulatory compliance standards. Service Line Presidents and the Service Line Safety Directors are responsible for ensuring compliance with all regulatory compliance standards for their respective areas. All Service Line leaders are responsible for ensuring that all safety and health policies and procedures are clearly communicated to and understood by all employees. Regional Leaders, Branch Managers and Client/Project Managers are expected to enforce the rules fairly and uniformly. **ABM Service Lines will adopt operationally-relevant programs to help ensure that they meet, if not exceed, all regulatory compliance standards.**

All employees are responsible for using safe work practices, for following all ABM directives, policies and procedures, and for assisting in maintaining a safe work environment.

The following is our system of helping to ensure that employees and management work together to maintain a safe work environment:

- Informing employees of the provisions of the I2P2.
- Evaluating the safety performance of all employees through employee observations and site hazard assessments.
- Recognizing employees who perform safe and healthful work practices. This recognition is accomplished by:
 - o Formal commendations based on observation of safe work practices
 - o Formal acknowledgement of safe work practices in performance reviews
- Providing training to employees whose safety performance is deficient.
- Disciplining employees for failure to comply with safe and healthful work practices. Each Service Line is responsible for developing disciplinary procedures that fit the individual needs of their operating units.
- Creating and implementing metrics for identifying and rewarding employees for demonstrating good safety practices

EMPLOYEE INVOLVEMENT

Each Service Line will establish processes to allow for employees to actively participate in site-based safety programs. These processes may be in the form of labor/management committees for safety; site safety committee teams or other employee-groups (i.e. Safety Advocate Teams) that are facilitated by operations or safety leaders. Each Service Line will establish committee/team meeting schedules, methods to record and track team/committee performance, tenure of team/committee members and a rewards system for participation, where appropriate.

All employees have the right and responsibility to stop work due to a hazardous condition or defective equipment and report to their Supervisor/Manager upon discovery (Reference: ABM “Stop a Job for Safety” Program).



Employee Responsibilities

Safety is part of every job and employees are expected to perform work tasks in a safe manner. Employees shall not attempt to perform any task for which they have not been trained. Under no circumstance shall a supervisor allow an employee be to create a hazard that could result in injury to themselves, their coworkers, the client, or the public. This also applies to the potential for damage to property.

Employees are expected to follow all safety rules and safe work procedures in all Service Lines. These rules include the safe operation of company vehicles, the wearing personal protective equipment while performing specific job functions, reporting hazards, and avoiding horseplay while at work or any threat of violence in the workplace.

Any violation of these rules or procedures is considered an issue for immediate progressive discipline in accordance with ABM HR Policies.

Employees shall attend all safety training, and are expected to demonstrate comprehension and understanding of the topic(s) covered prior to commencing work.

Engagement

Each Service Line will establish processes to allow for employees to actively participate in site-based safety programs. These processes may be in the form of labor/management committees for safety; site safety committee teams or other employee-groups (i.e. Safety Advocate Teams) that are facilitated by operations or safety leaders. Each Service Line will establish committee/team meeting schedules, methods to record and track team/committee performance, tenure of team/committee members and a rewards system for participation, where appropriate. Records of the safety meetings will be kept by local site leadership and a copy of the minutes including results of site safety inspections, resolution of hazards from inspection reports and accident investigation action items.

Employees shall follow all safety instructions provided to them by the on-site Supervisor. ABM employees shall generally be responsible for reporting:

- A. Any work-related safety concerns;
- B. Work-related injuries or illnesses;
- C. Threatening situations that could affect the safety or security of the work environment;
- D. Situations or conditions that could be reasonably expected to result in injury or property damage, and
- E. The presence of unauthorized individuals in the workplace.

Site-Specific Safety Meetings

Job sites are responsible for administering the Service Line’s monthly safety training. Training includes an informational flyer, subject matter quiz, and other material as identified.



Site-specific meetings may be held:

- When changes in work procedures, chemicals, tools, equipment or conditions is expected
- When health or safety issues are identified by the supervisor or employees and changes to the work process, additional PPE or updated training is needed to protect the workers from increased hazards.
- When there has been a recent accident or injury to discuss the methods adopted by ABM to prevent similar incidents in the future.

Employee Safety and Health Teams

Each Service Line Branch will organize and conduct an Employee Safety and Health Teams to ensure that a continuous flow of information is maintained. This team meets at least quarterly and is responsible for:

- Reviewing and or updating current safety programs;
- Reviewing injuries and investigation documentation;
- Providing corrective action measures when necessary;
- Identifying potentially hazardous conditions or work methods.

Employee Communication

The following outlines ABM’s 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 employee 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.
- Workplace safety meetings held at least monthly, and 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 employees and supervisors, including language translation where appropriate.
- Posted and distributed safety information.
- A system for employees to anonymously inform management about workplace hazards:
 - **Employees are encouraged to express their safety and health concerns without any fear of retaliation or reprimand. Employees may report unsafe work practices to their immediate supervisor or to a hotline telephone number which will direct their call to Region, Service Line or Corporate safety directors for immediate attention. This can be done anonymously if the employee desires. The ethics point hotline is 1-877-ALERT-04 or 1-877-253-7804.**
- A non-anonymous system of soliciting safety suggestions from our employees, to recognize innovative ideas for reducing hazards. Each Service Line will establish means for soliciting anonymous safety suggestions.

For our California operations, if elected by Service Line management, our organization chooses to use a labor/management safety and health committee meeting all the requirements of T8CCR 3203 (7) (c) (1) – (7) to comply with the communication requirements of subsection (a)(3) of T8CCR 3203.



Employee Workplace Injury Reporting

ABM Service Lines will ensure that their regional and local teams have an established process for receiving and promptly responding to any workplace injury or illness. This will include reporting to medical healthcare providers along with evaluation, at no cost to the employee. Workplace injury or illness reporting and related recordkeeping will comply with standards as outlined by Federal and State-administered OSHA programs.

HAZARD IDENTIFICATION

Hazard Assessment

Site-specific Hazard Assessments should be done prior to the commencement of work activity at a client site to determine the hazards present and plan for control measures to protect ABM employees. This includes new projects, tag jobs and jobs where additional, non-traditional, tasks or those jobs identified as higher risk have been requested by the client.

Following the initial Hazard Assessment, a schedule will be established to assure that each Hazard Assessment is reevaluated and updated on an annual basis for sites identified as having hazards outlined in ABM’s Safety Absolutes, but not to exceed every three (3) years for other sites – *assuming no change in operations*. Formal job descriptions with safety and physical demand criteria will be developed from the Hazard Assessments if job deviates from current description for use in employee placement and training. Adherence to all safety procedures specified by the Hazard Assessments will be required.

Hazard frequency/severity assessments will be performed for the major tasks at each client site as measured by operations with the most significant loss potential. Results of these assessments will be used to prioritize the sequencing of the Hazard Assessments.

Hazard Assessments will be conducted by ABM safety personnel as well as by third party experts coordinated by ABM safety leaders. Where appropriate, site hazard assessments will be conducted by ABM operations leaders. However, ABM Safety personnel will facilitate the assessments.

Injury Trend Analysis

ABM safety personnel in each service line will conduct an annual injury trend analysis to identify accident types and associated contributing factors. This analysis will be used to guide injury prevention strategies respective to the service line. Injury data will be collected from ABM risk management information systems, OSHA records and accident investigation records.

Safety Checks

Periodic safety checks will follow a schedule as identified by each Service Line to identify, evaluate and coordinate control measures for workplace hazards. Each Service Line should provide a schedule of inspections that meets or exceeds the following schedule:



- When our Injury and Illness Prevention Program is first established.
- 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 employees to processes, operations, or tasks for which a hazard evaluation has not been previously conducted.
- Whenever workplace conditions warrant an inspection.
- A regular frequency to be determined by each Service Line. In most cases this will be at least daily or at the beginning of the shift or job

Periodic inspections consist of identification and evaluation of workplace hazards utilizing the appropriate Service Line Hazard Assessment checklist/forms and any other effective methods to identify and evaluate workplace hazards.

Industrial Hygiene Assessments

Regular industrial hygiene assessments will be done by ABM safety leaders or outside vendors as needed to determine if overexposures to environmental hazards exist in client workplaces. Examples of environmental hazards include noise; chemical vapors, fumes, mists or gases; airborne dust; radiation, etc. Results of these assessments will be documented. Assessments will be used to develop recommendations for control measures where appropriate.

Procurement Process

New products introduced into ABM operations, including chemicals, tools and equipment, will be reviewed by ABM purchasing teams to ensure that they meet applicable governing regulations for safety. Where necessary, ABM purchasing teams will request assistance from ABM safety personnel for this review.

Accident Investigations

Investigation of workplace injuries which result in lost time from work will be coordinated and monitored by the ABM operations site manager (or Project Manager/District Manager, if assigned) and monitored by the Service Line Safety Directors. The investigation will include:

- Visiting the scene as soon as possible.
- Interviewing affected employees and witnesses.
- Examining the workplace for factors associated with the accident.
- Probing to determine the “root causes” of the accident/exposure/near-miss, including (but not limited to) to the following drivers: safety orientation; physical capabilities; hazard assessment; work observations; proper selection/maintenance of tools; PPE; material use; environmental factors; training; and leadership messaging/engagement.
- Taking corrective action to prevent the accident/exposure/near-accident from reoccurring.
- Recording the findings and corrective actions taken on the Accident Investigation Report forms as adopted by each Service Line.



Completed reports will be forwarded to the ABM safety leadership team for review. Risk assessments will be performed prior to implementation of all corrective or preventive action recommended as a result of the accident/exposure investigations, to ensure that there are no adverse unanticipated outcomes from the proposed action.

HAZARD PREVENTION

Correction of Hazards

Unsafe or unhealthy work conditions, practices or procedures at ABM client site operations shall be corrected **in a timely manner** based on the severity of the hazards, and according to the following procedures:

- When observed or discovered.
- When an imminent hazard exists which cannot be immediately abated without endangering employee(s) and/or property, we will remove all exposed employees from the area except those needed to correct the existing condition and **work operations will cease until the hazards are abated**. Employees required to correct the hazardous condition shall be provided with the necessary protection.
- When lack of control of building/environment/machinery/equipment at client sites prohibits ABM site leaders from proactively controlling hazard, employees shall be removed from the area until client removes the hazard and it is confirmed by ABM site leaders.

All hazard correction actions and dates they are completed shall be documented using documentation created and adopted by each Service Line. At a minimum, corrective action records will include specific details of the hazard abatement, a signature of a leader at the site who has review and approved the corrective action and a date of completion of the abatement.

Hierarchy of Controls

ABM will implement and maintain a process for achieving feasible risk reduction based upon the following preferred order of controls:

- Hazard elimination
- Substitution of less hazardous materials, processes, operations, or equipment
- Engineering controls
- Warning signs or barricades
- Administrative controls
- Personal protective equipment



Feasible application of this hierarchy of controls shall take into account the following:

- The nature and extent of the risks being controlled;
- The degree of risk reduction desired;
- The requirements of applicable local, federal, and state statutes, standards and regulations;
- Recognized best practices in industry;
- Available technology;
- Cost-effectiveness; and,
- Internal organization standards.

Management of Change

ABM service lines will establish and implement processes to identify and to prevent an increase in hazards associated with:

- New processes or operations at the design stage
- Changes to the existing operations, products, services or suppliers.

The process for design reviews and management of change shall include:

- Identification of tasks and related health and safety hazards
- Consideration of hazards associated with human factors
- Significantly reducing the hazards by following the hierarchy of controls
- Review of applicable regulations, codes, and standards
- A determination of the appropriate scope and degree of the design review and management of change

ABM implements Hazard Controls to bring our facilities into compliance with Federal OSHA, other State OSHA Laws and the California Occupational Safety and Health Act of 1973 and Cal/OSHA regulations. Generally, this means coming to one of three ends:

1. The hazards are materially reduced using the incremental abatement process;
2. The hazards are reduced to the extent feasible, and then the Branch Manager periodically looks to see whether additional controls are feasible and, if so, he/she implements them promptly; or
3. The hazards are eliminated.



Contractor Controls

Each Service Line will be responsible for adopting procedures to assure that contractors performing work on ABM’s behalf at client sites observe all of the company’s safety rules and procedures at all times. This includes, where applicable, insuring that contractors have safety programs in place that are appropriate for the hazards present and are equal to, or exceed, ABM’s minimum requirements for safe work practices.

Emergency Preparedness

ABM will establish and implement a process to prevent, prepare for, and/or respond to emergencies, including:

- Identification of potential emergencies
- To protect people and minimize risk of injury or property damage from potential emergencies
- To ensure that necessary information is communicated both internally and externally
- To recover promptly and efficiently following an emergency
- Leadership training on managing and responding to emergency situations at the work site
- Awareness training for all employees on the basic emergency plan
- Annual testing of the emergency plans through table top drills and similar activities
- Annual review and update the plans and procedures as necessary.

TRAINING

Instruction, Awareness and Competency

All employees, 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 I2P2 is first established.
- To all new employees.
- To all employees given new job assignments for which training has not previously provided.
- Whenever new substances, processes, procedures or equipment 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 employees under their immediate direction and control may be exposed.
- To all employees with respect to hazards specific to each employee's job assignment.



This training will include but not necessarily be limited to the following:

- Explanation of the I2P2, emergency action plan and fire prevention plan, and measures for reporting any unsafe conditions, work practices, injuries and when additional instruction is needed.
- Information about chemical hazards to which employees could be exposed and other hazard communication program aspects.
- Availability of toilet, hand-washing, and drinking water facilities
- Provisions for medical services and first aid, including emergency procedures.
- Proper housekeeping, such as keeping stairways and isles clear, work areas neat and orderly, and promptly cleaning up spills.
- Prohibiting horseplay or other acts that adversely influence safety.
- Proper storage to prevent:
 - Stacking goods in an unstable manner
 - Storing materials and good against doors, exits, fire extinguishing equipment and electrical panels.

Where applicable, our training may also include:

- Prevention of musculoskeletal disorders, including proper lifting techniques.
- Use of appropriate clothing, including gloves, footwear, and personal protective equipment.
- Proper food and beverage storage to prevent them from becoming contaminated.

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

Regular assessments of employees’ safety knowledge will be done by supervisors and by the ABM safety leadership team to verify the employees’ awareness and competency relative to safety. Frequency of assessments will be determined by each Service Line. At minimum they should be done annually. Retraining will be determined by each Service Line or whenever it is evident that an employee’s level of competency is less than what is needed to assure safe work practices.

EVALUATE & EVOLVE

Performance Audits/Continuous Improvement

Annual audits of the I2P2 program will be coordinated by ABM’s safety leadership team. Audits are designed to determine the level of effectiveness of the corporate and Service Line safety efforts by evaluating the timeliness and completeness of required safety documentation, safety meetings, inspections, accident and exposure investigations, etc. Results of the audits will be included in management and employee performance evaluations. The goal is to provide a means for continuous improvement by identifying areas where opportunities for more effective controls exist.



Management Review Procedures

ABM’s Executive and Service Line leadership teams will coordinate periodic reviews, as deemed necessary, of the ABM’s safety activities to assure that they continue to be adequate and suitable for ABM’s operating profile, and that they are producing the desired results. Recommendations for improvements will be made based on the results of these reviews.

Recordkeeping, Document Control & Records Retention

ABM’s OSHA Recordkeeping and key records requirements for all Service Lines are as follows:

1. Records of **employee injuries and illnesses**. This includes OSHA Forms 300 and 300A (the OSHA Log of Occupational Injuries and Illnesses and the OSHA Summary of Occupational Injuries and Illnesses, respectively), as well as copies of individual First Reports of Injury, copies of Accident/Exposure Investigation Reports and copies of appropriate medical records. Medical records are kept in separate secure files to assure employee privacy. OSHA 300A forms for the prior year are posted in locations accessible to affected employees from February 1 of each year until 90 days thereafter, as required by OSHA standards. OSHA records are maintained on file for at least five (5) years. Medical records should be kept for the duration of employment plus 30 years from termination of employment. Other records should be kept for at least one (1) year.
2. 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 corrective action(s) taken to correct the identified unsafe conditions and work practices, are recorded on the Service Line Hazard Assessment checklist/forms and corrective action tracking documents adopted by each Service Line. These records are maintained for at least one (1) year.
3. Documentation of **safety and health training** for each employee, including the employee’s name or other identifier, training dates, type(s) of training, and training providers are recorded on Service Line employee training and records. This documentation is maintained for at least one (1) year.
4. Documentation of **industrial hygiene assessment results**. Documentation for noise assessments should be maintained for two (2) years at minimum. Documentation of employee audiometric test results should be kept for the duration of employment plus 30 years from termination of employment. Other environmental documentation should be kept for thirty (30) years.

All documents affecting safety policies, assessments, injury reporting, accident investigations and training shall be maintained by the branch, region or service line having responsibility for that document. ABM safety personnel will have control over the following documents:

- I2P2
- Safety manuals & programs
- Safety training materials
- Safety assessments conducted by/through ABM safety personnel



Changes to these safety documents can be requested by the following methods:

- Verbal
- Email
- Hardcopy memo/letter

Only ABM safety personnel have the ability and authority to make changes to these documents. Changes may require review by senior ABM safety leaders along with ABM legal and human resources teams. These documents are released as they are issued or revised.

EXCEPTION – Our organization retains training records for the term of employment of employees who work for us for less than one (1) year. These records are provided to the employee(s) upon termination of their employment.

****Refer to the attached Safety Record Retention Guide attached for a complete outline of safety records retention requirements***

Safety Records Retention Guide

Safety Records	Retention Period
OSHA 300 log, the privacy case list (if one exists), the annual summary and the OSHA 301 Incident Report forms	5 years following the end of the calendar year that these records cover. Each year the annual summary should be posted from February 1 st through April 30 th
OSHA Inspections, Citations and Proposed Penalties – OSHA Form 2203 should be posted (notice of where information about OSHA protections and obligations can be obtained)	No record retention time is specified
OSHA Citations – if an OSHA citation is received, the citation should be immediately posted at or near the place where the violation occurred.	Record should be posted until the violation is abated or for 3 working days (whichever is later)
OSHA Abatement Verification Procedures – if an OSHA citation is received, documentation must be submitted to OSHA demonstrating that abatement is complete for all violations – no more than 10 days after the abatement date. A formal abatement plan may be required when the time permitted for abatement exceeds 90 days.	No record retention time is specified
Employee exposure measurement records	30 years
Noise exposure measurements	2 years (minimum)
Audiometric exams	Duration of employment plus 30 years from termination of employment
Material Safety Data Sheets (MSDS) containing physical and health hazards of each hazardous substance used in the workplace	30 years from the date the substance was last received in the workplace
Medical records of employees for employers subject to OSHA standards including but not limited to asbestos, benzene, cadmium, formaldehyde and occupational exposures to bloodborne pathogens	Duration of employment plus 30 years from termination of employment
Employee medical records concerning the health status of an employee including medical and employment questionnaires or histories; results of medical examinations or lab tests, medical opinions, diagnoses, progress notes and recommendations; first aid records and the results of physical examinations considered in connection with any personnel action	Duration of employment plus 30 years from termination of employment <i>Exception: For persons employed less than one year, medical records need not be retained if provided to employee upon termination</i>
Respiratory Protection - written training record and written fit test records	Training required annually and written fit test records retained until next test takes place
Bloodborne Pathogen Training – written training record	3 years

Safety Records Retention Guide

Process Safety Management – written process safety information (including chemical hazards, process technology and equipment), process hazard analysis and written operating procedures. Initial training required with retraining required every 3 years (must have written retraining record)	No written program or training record retention time is specified
Personal Protective Equipment – retraining required as necessary with written retraining record	No training record retention time is specified
Lockout/Tagout - retraining required as necessary with written retraining record	No training record retention time is specified
Confined Spaces – permit-required confined spaces require retraining as necessary with written training record. Cancelled entry permits require retention.	No training record retention time is specified. Cancelled entry permits should be retained for 1 year
Powered Industrial Trucks – requires operator evaluation at least once every three years with written training record.	No training record retention time is specified
Hazard Communication – written HAZCOM program with hazard evaluation procedures, chemical inventory, labeling procedures, MSDS system and training outline/record	No record retention time is specified
Welding (general) – written hot work permits	Best Management Practice would be to save the previous 12 months permits issued, if any
Hazardous Waste Operations and Emergency Response – written safety & health program including site-specific safety plan for employees involved in hazardous waste operations.	No record retention time is specified for written plan.
Automatic Sprinkler Systems – Original acceptance documents, Annual Service report and quarterly tests (Main drain and waterflow detection device tests (inspector’s test connection tests). NFPA 25 requires annual service and quarterly main drain, and semi-annual water flow detection device tests.	Original acceptance tests and other documentation held permanently. NFPA 25 – maintain subsequent tests for 1 year after the next inspection, test or maintenance.
Fixed Extinguishing Systems - where fixed extinguishing systems are installed in accordance with OSHA standards. Require annual service/inspection of system.	Best Management Practice would be to retain the annual service report for 2 years.
Portable Fire Extinguishers – maintenance inspections must be done annually.	Annual Service record/tag should remain on the extinguisher for 12 months. Inspection records must be retained for one year after the last entry.

Safety Records Retention Guide

<p>Fire Alarm and Fire Detection Systems- NFPA 72 requires inspections, tests and maintenance on varied schedules. At a minimum, an annual service should be provided, and other inspections and tests should be performed per the individual component's requirements per NFPA 72.</p>	<p>Records of inspections, tests and maintenance should be retained until the next inspection, test or maintenance, and for 1 year thereafter.</p>
<p>Emergency Action Plan – plan must contain fire and emergency reporting protocol, evacuation procedures, protocols for employees who remain to operate critical plant equipment, accounting procedures for employees, rescue and first aid responsibilities for those assigned these duties and where to obtain additional information. Employees should be trained in this plan.</p>	<p>Emergency Action Plan should be retained until modified, updated, or replaced.</p> <p>Training records should be retained for 12 months since the last training was held.</p>