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1. Purpose

The purpose of the Short-Service Employee policy of Environmental Restoration LLC (ER) is to assure that workers with less than six months experience at ER are identified, adequately supervised, trained, and managed to prevent injury to themselves or others, property damage, or environmental harm.

Any worker with less than six months service in the same job/position with ER will be considered a short-service employee (SSE). Experienced workers who are new to a location will be considered by the Supervisor or the Site Health and Safety Officer (HSO), for inclusion in the SSE program based on the specifics of their assignment.

Factors to consider would include significant differences in:

- Job responsibilities/duties from previous assignments/employers
- Work processes/practices from previous assignments/employers
- Equipment/tools from previous assignments/employers
- Their Skill level, and
- Their Familiarity with co-workers

2. Scope

This procedure applies to all ER offices and jobsites. It is important to ensure that newly hired employees work under the direction of experienced personnel.

3. Definitions

Mentoring – A process of transferring skills and knowledge from one person to another in a work environment.

Supervisor – The individual responsible for the direct supervision and oversight of an employee.

Short Service Employee (SSE) – A newly placed full-time or temporary employee or subcontractor with less than six months' experience in assigned job.

Short Service Employee Mentor (Mentor) – Person with at least 6 months' employment with the company who has demonstrated safe and efficient work habits.

4. Responsibilities

Management - The responsibilities of company leadership and management are to set expectations, evaluate effectiveness and:

- make and demonstrate a personal commitment to a strong and functional Health, Safety and Environmental work culture,
- establish a written, signed and dated HS policy that sets compliance expectations for management and employees,
- provide employees access to company policies, standards and procedures,
- establish written HS Orientation and SSE Programs for all employees newly assigned to any job or task,
- ensure that all employees new to a job assignment are identified to the responsible supervisor(s) and placed into the HS Orientation and SSE Programs, and
- audit, review performance and take timely corrective actions to continually improve the effectiveness of the orientation and SSE Programs.

Supervisor -The responsibilities of Supervisors in the SSE Program are:

- know which jobs and crews are using SSEs,
- ensure SSEs are appropriately identified per this plan,

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- develop and communicate Activity Hazard Analyses (AHAs) to affected personnel upon initial assignment and when the operation changes,
- ensure SSE Mentor possesses proper knowledge and skills in the job task assigned,
- ensure SSE Mentor is adequately training SSE,
- ensure SSE is gaining the necessary knowledge and skills in the job tasks, and
- follow all safety rules and company policies.

Mentor - The responsibilities of the Mentor in the SSE Program are to:

- be an experienced and responsible person assigned by the supervisor to work with the new employee,
- be selected based on a history of safe work and policy/procedural knowledge,
- be able to communicate the expectations and characteristics of work tasks and their associated hazards,
- have a patient disposition, as well as the desire and willingness to devote the necessary time to succeed as a mentor,
- possess knowledge and skills in the job tasks assigned to the SSE,
- be willing and able to effectively listen to the SSE to determine if the SSE is learning and retaining the knowledge being shared,
- be willing to watch a SSE perform a job without interfering as long as the SSE is not in a position to harm themselves, others, the environment or the equipment,
- adopt a positive safety attitude, avoid criticism, and strive to build confidence and self-esteem in the SSE,
- be able to teach the SSE the proper way to create a quality AHA and to follow that AHA in performing tasks,
- keep abreast of new equipment in their field of expertise,
- refrain from taking shortcuts and doing anything else that jeopardizes health or safety,
- demonstrate a positive work ethic at all times, and
- introduce the **SSE Checklist** (Appendix B) to the new employee. The checklist is a tool to train the new employee and monitor progress,
- review the checklist with the new employee periodically over a six-month period, and forward the information for supervisor and management review, and
- follow all company policies and procedures.

Short Service Employee - The responsibilities of the SSE are to:

- be willing to watch and listen to the Mentor,
- establish a positive safety attitude toward assigned job tasks,
- learn how to create and follow AHAs,
- be willing to learn how to do each task in a safe and environmentally sound manner,
- stop and report unsafe conditions immediately,
- participate in safety meetings, and
- follow all safety rules and company policies.

Project Health and Safety Manager Responsibilities - The responsibilities of the Project Health and Safety Manager in the SSE Program are to:

- serve as subject matter resource to support the Supervisor, Mentor, and SSE
- ensure the SSE gets the necessary safety training, and
- follow all policies and procedures.

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5. Procedures: The following procedures apply to the Short Service Employee Program.

Notification (Appendix A)

The HR department shall notify office/jobsite management and the safety department of all newly hired employees who require training. The Operations department shall notify jobsite management and the safety department of all reassigned employees who require training.

Orientation

- All ER SSEs, regardless of job function, shall participate in any necessary site-specific orientations before performing work on project locations. The orientation will include a Job Orientation Checklist (Appendix C) that the supervisor reviews with each newly hired employee.
- Each SSE will be provided orientation specifically based on job position and job-related topics prior to performing job tasks.
- Each SSE will be taught how to access company policies, standards and procedures.
- Satisfactory completion of the orientation must be signed and dated by the employee and supervisor.

Training

The supervisor will ensure that each SSE is properly trained per federal, state, industry, and company requirements before starting work when:

- the employee is hired;
- the employee is appointed a new job assignment; and
- the employee is exposed to new substances, processes, procedures, equipment, etc that represent a new hazard to the employee.

The supervisor will ensure that each SSE is properly trained in:

- the hazard(s) present in the workplace;
- the policies, procedures, processes and PPE utilized to control these hazards and prevent illnesses, injuries, property damage and/or environmental incidents; and
- the skills necessary to conduct their assigned jobs safely and efficiently while providing quality and economy.

Mentor Program and SSE Review

All SSE personnel shall be assigned an experienced mentor to assist the employee during his/her SSE period. It is the mentor's responsibility to closely supervise the assigned SSE and prevent him/her from performing tasks for which he/she is not properly trained. A mentor may only be assigned to one crew that includes SSEs, and he/she must remain on site with them.

Formal meetings between the SSE, his/her supervisor and mentor will take place one month and three months after the hire or transfer date (more frequently if necessary). The purpose of these meetings is to provide performance feedback to the SSE and evaluate his/her progress in understanding workplace hazards and ER health and safety (HS) policies.

A final meeting is held at the six-month point to make a formal determination whether the SSE can work without posing a hazard to him/her or others. When the supervisor and mentor have agreed to this, employees are removed from the SSE program.

If concerns remain about the employee's ability to work safely after six months, the supervisor evaluates the

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situation and develops a forward plan for the employee in consultation with HR. To be removed from SSE status, an employee must exhibit safe behavior for six months and have a general awareness and working knowledge of ER HS policies. Release from SSE status requires the approval of both the employee's mentor and the supervisor. Documentation should be maintained for a period of one year after an employee has been removed from SSE status.

Identification System

It is important for supervisors, co-workers and project managers to recognize a SSE; therefore, an identification system has been developed for this purpose. The identification system is a means of communicating to the workforce that the SSE is in a transitional period. It will not be a designation of in-experience or used to mark an employee as having lower skill sets.

ER SSEs will wear a hard hat with a distinctive difference in appearance by placing a red SSE Decal on the right and left sides of the hard hat that will allow quick and sure identification of the SSE by other crew members. The decal shall have the date when the employee is no longer considered to be a SSE. The method used to identify SSEs shall be communicated to all parties involved in the operation. This also serves as a reminder of each person's responsibility for the safety of others.

The Supervisor removes the decals and other identifiers upon expiration of the SSE term, and after verifying that the SSE exhibits a knowledge and skill level to perform the job tasks assigned.

Working with Experienced Crews

Prior to starting work, the Supervisor shall notify the Project Health and Safety Manger if SSEs are present on work crews.

Because of the nature of SSE status, crew makeup will be as follows:

- A single person "crew" cannot be an SSE. Working multiple SSEs on a crew has the potential to increase the risk of crew injuries
- Two to five-person crews can have only one SSE per crew, and crews with six or more should not exceed 2 SSEs.
- Crews that have more than 20 percent SSE personnel shall only be permitted with a written variance form, which serves as a mitigation plan, by the appropriate manager or supervisor.

For purposes of this program, a crew is defined as those workers working at a single location who are employed by ER.

Any subcontractors employed by ER must manage their SSEs in accordance with the requirements of the above SSE program.

6. Documentation

The HR Representative ensures the employee information required in the first section of SSE Notification form for new employees (Appendix A) is completed and then forwards to the appropriate Office Manager / Supervisor for full completion.

Upon completion of all required training, supervisor signs off and emails completed notification form to training@erllc.com.

All records for the SSE Orientation and Training shall be maintained at the corporate office by the HR Department. Copies of these records shall be kept onsite by the Project Manager.

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7. SSE Quality Assessment and Control

- Management should review the effectiveness and quality of the SSE Program at least annually.
- SSE Orientation and Training documentation should be audited for accuracy, timeliness and completeness.
- Onsite inspections should be conducted to ensure that supervisors, mentors and SSEs are adhering to the SSE Program.
- The number of incidents involving new employees should be measured, compared to the general workforce and evaluated for trends or performance variations.
- Management should ensure that all program deficiencies are promptly corrected and documented.