

**DECEMBER 2008 LOSS PREVENTION NEWSLETTER**  
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**GET YOUR HOUSE IN ORDER FOR 2009**

With the economy a continuing challenge, it is well to make sure you are in compliance with the many rules and regulations that could result in significant fines if not in compliance.

- **OSHA** - This is the month in which to carefully review all entries in the OSHA Log 300. Check all work-related injuries and illnesses to ensure proper recording has been accomplished. Remember there are incidents which, while reportable under Workers Compensation, should not be entered in the OSHA Log. Verify all entries that **MUST** be recorded and have full paper back-up for those entries. Be careful there are no omissions. When the final report is completed, it must be signed off by the senior officer at the establishment (usually the general manager). He or she confirms the authenticity of the report and may be subject to criminal charges, fines and possible imprisonment if an OSHA investigation should find significant discrepancies. You will be reminded in January, 2009 of the necessity of completing an OSHA 300 Summary Form for posting from February 1 through April 30, 2009. This will provide a summary for review by all employees of the injury and illness record for 2008.
- **Emergency Evacuation Program** - When is the last time you reviewed your Emergency Evacuation Program? It is wise to list assignments for implementation of the Emergency Evacuation Program by job designation rather than by an employee's name. This will cover transfers, departures or other changes in staff assignment during the year. Have there been any structural changes that would interrupt way of exit from the premises? Have mirrors or draperies or other installations that could cause confusion in proper identification of an exit been introduced? Does every employee have a current copy of the Emergency Evacuation Program? Does each employee, by job assignment, know exactly what to do in an actual evacuation? Are all employees aware of the assembly area reasonably removed from the premises? (remember the collapse of the Twin Towers). Are employees assigned to escort guests to the assembly area so an effort may be made to account for employees and guests? It is impossible to effectively account for all guests as some may be away from the premises; but it gives the basis for an indication of how many guests must be accounted for. On each work shift, individuals, by job title, should be responsible for shutting off power sources (gas, electric, steam, etc.) or water sources as may be required under the emergency condition. They must know the location and use of a proper tool, wrench, key or other appropriate device which should be secured at the site. Such action should not be taken if the life of the employee would be endangered.

- **Terrorism** - The recent tragic events in Mumbai, India remind us of the vulnerability of the lodging establishment. It is impossible to predict such an event and with a close-knit terrorist group, infiltration to learn of plans in advance is almost impossible. The security staff must provide training to every employee in developing greater awareness to actions of guests or the public and to be especially sensitive to items in the guest room that are cause for suspicion or concern. Unless language problems exist, there should be a direct reporting relation between an employee and a security department representative. In most cases, there will probably be a member of security staff that can speak the language of the reporting employee. Key staff personnel should provide 24/7 coverage on a “first name” basis with the local police department and Department of Homeland Security (DHS) Staff; or other agency in the community with terrorist interception responsibility. **All employees must be instructed to never confront a suspicious person(s) but to report to the designated security or management representative as soon as such a report can be safely made.**
- **Portable fire extinguishers.** Inventory all portable fire extinguishers. Be sure they are in the appropriate cabinet or other designated location, are fully charged and have been tagged with current service date and hydrostatic test date. Generally, the canister must be tested every five years for carbon dioxide or water units, and every twelve years for dry chemical units. “Google” Fire Extinguisher Hydrostatic Testing Intervals for the full range of units. Employees should have hands-on-training and should know the proper extinguisher to use and should not use an extinguisher unless trained.

Remember, when discovering a fire, the employee **MUST** immediately sound the alarm and the fire department must be notified. The employee should determine if the fire is in the early stages where an extinguisher could be effective. Otherwise, the door to the affected area should be closed and the employee should evacuate. The employee should warn all persons in the vicinity to immediately evacuate by the fire stairs, not by elevator.

- **Machine and Equipment Guarding** - Violation of this standard is among the top ten in each year’s OSHA analysis. This has special relevance to the lodging industry. General requirements for machines note that guards should be affixed to all machines when practical and possible. Care must be taken the guard does not pose a hazard. The point of operation is the focus of any guarding effort. Employees must be instructed to never by-pass a guard. This is especially true with laundry and food preparation equipment. Supervisors must be aware of possible violations and insist upon proper use of guarding at all times.
- **Personal Protective Equipment** - Recent review of this regulation confirmed the responsibility of the employer to provide personal protective equipment, including equipment for eyes, face, head and extremities; protective clothing; respiratory devices; and protective shields and barriers. Such equipment must be maintained in a sanitary and reliable condition and replaced, as necessary. Review your program to

determine compliance and supervision of the program to adequately protect the employees. There will frequently be resistance to use by the employee; so supervision must be alert.

- **Safety Color Code for Marking Physical Hazards.** Red shall be used for fire protection equipment and apparatus. Danger will be indicated in red, as in the use of safety cans or other portable containers of flammable liquids. Red lights shall be provided at barriers. Danger signs shall be painted red. Emergency stop bars, such as on flatwork ironers, shall be in red. Stop buttons or electrical switches where letters or other markings appear, used for emergency stopping of equipment, shall be in red.

The color yellow shall be the basic color for designating caution and for marking physical hazards such as striking against, stumbling, falling, tripping and “caught in between.” This color has been used to advantage in both back-of-the-house stairways and fire stairwells to note top and bottom step of each flight.

- **Medical and First Aid** - In the absence of an infirmary, clinic, or hospital in near proximity to the workplace which can provide necessary treatment to employees, a person or persons shall be adequately trained to render first aid. First aid supplies shall be approved by the property’s consulting physician. This individual would not treat a guest or other victim unless arterial bleeding, stoppage of breathing or ingestion of poison has occurred. *Essentially, this mandate requires a certified first aid person on each work shift.*
- **Bloodborne Pathogens** The Hospitality Industry Exposure Control Plan is designed to eliminate or minimize employee exposure to bloodborne pathogens that may be encountered in the workplace. Bloodborne pathogens are defined as pathogenic microorganisms that are present in the blood and can cause disease in humans. These pathogens include, but are not limited to, Hepatitis B Virus (HBV) and Human Immunodeficiency Virus (HIV) which causes AIDS. Review your program to ensure you have made an exposure determination; established a method for compliance; offered Hepatitis B vaccination and post exposure evaluation to employees at risk; communicated hazards to employees; and provided training and information.

High risk employees include hotel nurses and/or physicians; emergency response personnel, security and safety staff, and lifeguards. Other employees with possible exposure include foodservice personnel, housekeeping personnel, laundry personnel and maintenance personnel.

Tasks or procedures in which occupational exposure may occur include:

Cleaning cuts or abrasions

Treating burns

Administering CPR

Laundering linens

Removing contaminated linens and towels from guestrooms

Cleaning vomitus from food service areas

## Clearing blocked toilets

To minimize the number of employees requiring the Hepatitis B vaccination, it is possible to establish a “swat team.” Specially trained employees who have received the vaccination series and have full protection (gowns, gloves, eye and face protection, etc.) will respond to an incident and provide the clean-up. The employee discovering the exposure would withdraw and call for the specialists.

Of course, without such a team, special training, personal protective equipment, and the availability of the vaccination must be provided to all employees at risk. (An employee may decline the vaccination. In that case, a special “Declination Form” must be completed and made part of the employee’s personnel file.). In the event of an accidental exposure to blood or body fluids or a needle-stick from a carelessly discarded needle, a medical decision will be made as to whether a vaccination protocol is indicated. In any event, such exposure, under OSHA mandate, will require retention of all pertinent records for a 30-year period, even though the employee may no longer be employed.

- **Hazard Communication (HAZCOM)** - This section of the law requires informing all employees as to hazardous chemicals they may be using while on the job. To comply, ensure the presence of a list of hazardous chemicals and chemical compounds in use on the property.

Review all purchases for the past year.

Perform a physical inventory.

Identify unlabeled containers, if possible. Arrange for proper disposal of materials no longer used. If in quantity, obtain professional assistance to comply with EPA disposal requirements.

Establish daily needs by department. Determine if a large supply constitutes a flammability, toxicity or other health hazard.

Establish an MSDS Library. Verify a material safety data sheet for every hazardous chemical in use. This provides the employee information on the nature of the material and how to use it safely. There must be a master file for the establishment, plus department files available to employees 24/7. Also, have a complete file available at the front desk for any emergency responders.

Check on the labeling program. Labels must:

Identify the material in the container.

Provide the manufacturer’s name, address, phone number and special emergency phone number (if available).

List appropriate hazard warnings.

Although it specifies instructions in English, it makes sense to also have it in other languages spoken – Spanish, Indonesian, etc.

A written hazard communications program must be available to all employees plus a formal training program with proof of training in file; and follow-up sessions, etc.

**It obviously is not possible to cover all of the rules and regulations you encounter in the various jurisdictions. However, this provides a format you might follow on a case-by-case basis at your establishment.**