	DISCIPLINARY POLICY	Document No.:	HSE-OP-003
		Department:	Operations
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Purpose

The disciplinary system does not exist primarily to punish employees. Its purpose should be to control the work environment so that workers are protected and accidents are prevented. A disciplinary system helps ensure workplace safety and health by letting the Trinity's employees know what is expected of them. It provides workers with opportunities to correct their behavior before an accident happens.

A disciplinary system is one of the keys to successfully implementing the Trinity's safety and health program. It ensures that the Trinity's rules and safe working practices are taken seriously by employees and are actually followed. It lets employees know how Trinity expects them to operate in relation to the goals of the Company's safety and health program. And it lays out the actions the Trinity will take if individuals do not meet the Company's expectations. The employee's supervisor and all members of management are responsible for the enforcement of this disciplinary program.

A disciplinary system cannot work in a vacuum. Before the Trinity can hold employees accountable for their actions, the Company first needs to establish its safety and health policy and disciplinary rules.

Policy Statement


Employees need to know the Trinity's position on safety and health and what the Trinity expects of them. They need a clear understanding of the rules and the consequences of breaking those rules. This is true in all areas of work, but it is especially important for worker safety and health. As part of the policy statement, and in the employee safety handbook, the Company has a written statement setting forth the Trinity's disciplinary policy. Trinity managers and supervisors will always be on the lookout for safety violations and will conscientiously and vigorously enforce the Company's commitment to safety.

Employee Information and Training

It is important that employees understand the system and have a reference to turn to if they have any questions. Therefore, in addition to issuing a written statement of the Trinity's disciplinary policy, the Company has drawn up a list of what it considers major violations of Trinity policy and less serious violations. This list specifies the disciplinary actions that will be taken for first, second, or repeated offenses. This list is not all-inclusive other types of violations can result in specific levels of disciplinary action relative to the seriousness of the violation and entirely at the Company's discretion.

The list for immediate termination and grounds for immediate discharge are:

- Drinking alcohol, and/or drug abuse prior to or during working hours
- Fighting, provoking or engaging in an act of violence against another person on Trinity property

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- Theft
- Willful damage to property
- Failure to wear Personal Protective Equipment (eye protection, hearing protection, safety helmets, etc.).
- Not using safety harnesses and lanyards when there is a potential for falling
- Removing and/or making inoperative safety guards on tools and equipment
- Tampering with machine safeguards or removing machine tags or locks
- Removing barriers and/or guardrails and not replacing them
- Failure to follow recognized industry practices
- Failure to follow rules regarding the use of company equipment or materials
- Major traffic violations while using a company vehicle
- Engaging in dangerous horseplay
- Failure to notify Trinity of a hazardous situation; and
- Other major violations of company rules or policies

General Offences requiring a warning and can lead to termination:


- Minor traffic violations while using Company vehicles
- Creating unsafe or unsanitary conditions or poor housekeeping habits
- Threatening an act of violence against another person while on company property
- Misrepresentation of facts
- Unauthorized use of Trinity property
- Excessive tardiness and late to work
- Disrespect and/or insubordination to authority
- Other violations of Trinity Policy and rules

Training

Training can reduce the need for disciplinary action. The Company shall instruct employees in the importance of workplace safety and health, the need to develop safety habits, the Company's operations, safe work practices, and the hazards they control, and the standards of behavior that the Trinity expects. Trinity's employees must understand the disciplinary system and the consequences of any deliberate, unacceptable behavior.

Supervision

Supervisors are responsible for the enforcement of this Disciplinary Action Program. Supervision includes both training and corrective action. Ongoing monitoring of the Company's employees' work and safety habits gives the Company's supervisors the opportunity to correct any problems before serious situations develop. In most cases, effective supervision means correcting a problem before issuing any punishment. Physical inspections by Trinity officials that indicate violations showing overall lack of commitment to Trinity safety goals will be under the same level of disciplinary actions.

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Where the relationship between employees and their supervisors is open and interactive, problems are discussed and solutions are mutually agreed upon. This type of relationship fosters a work environment where the need for disciplinary action is reduced. When such action is needed, the parties are more likely to perceive it as corrective than punitive.

Employee Involvement

Employees are encouraged to help informally in the enforcement of rules and practices. The intent here is not to turn employees into spies and informers, but to encourage them to be their "brother's keeper" and to watch out for the safety and health of their colleagues. Many employers successfully have encouraged an atmosphere -- a company "culture" -- where employees readily speak up when they see an easily corrected problem, for example, a coworker who needs reminding to put on safety goggles.

Trinity's employees deserve the opportunity to correct their own behavior problems. An effective disciplinary system is a two-way process. Once a problem is spotted, discuss it with the employee, who should be given at least one or two opportunities to change the behavior or correct the problem. Only after these discussions (and possibly retraining) should disciplinary action be taken.

Appropriate Control Measures

Disciplinary actions need to be proportionate to the seriousness of the offense and the frequency of its occurrence. It is certainly inappropriate to fire someone for occasional tardiness. It is equally inappropriate to issue only oral warnings to an employee who repeatedly removes a machine guard.


Disciplinary procedures should not be instituted without explanation. The Company will provide feedback to the employee on what behavior is unacceptable, why the corrective action is necessary, and how the employee can prevent future violations and disciplinary action. In addition, take time to recognize an employee who improves or corrects his/her behavior.

Consistent Enforcement

Workers must realize that safe work practices are a requirement of employment and that unsafe practices will not be tolerated. It is necessary, therefore, that the employer has a disciplinary system that is implemented fairly and consistently.

If Trinity's disciplinary system is to work well and be accepted by the Company's workforce, the system applies equally to everyone. This includes subjecting managers and supervisors to similar rules and similar or even more stringent disciplinary procedures.

For minor violations, supervisors shall meet with the employee to discuss the infraction and inform the employee of the rule or procedure that was violated AND describe the corrective action needed to remedy the situation.

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Documentation

One key to ensuring fairness and consistency in a disciplinary system is keeping good records. It is in the best interest of both the Company and the employee to have written rules and disciplinary procedures. It is just as important to document instances of good or poor safety and health behavior, including discussions with the employee, and to place relevant information in the employee's personnel file.

Documentation serves a variety of purposes. It helps Trinity to track the development of a problem, corrective actions, and the impact of measures taken. It provides information so the Company can keep employees informed of problems that need correction.

When Trinity is evaluating the managerial and supervisory skills of a supervisor, it provides a useful record of how they handled problems.

If warnings, retraining, and other corrective actions fail to achieve the desired effect, and if Trinity decides to discharge an employee, then documentation becomes even more critical. Conversely, the Company will conduct an annual clearing of the personnel files of employees whose good overall safety records are marred by minor warnings.

Attachments

HSE-BF-008 Notice of Safety Infraction