



**GEMINI TECH SERVICES, LLC.**

**DYNAMIC / DEDICATED / DRIVEN**

**5019 East 1-20 Frontage Road  
Willow Park, Texas 76087**



# **SAFETY POLICY**



**Table of Contents**

<b>1.0 Purpose</b>	<b>4</b>
<b>2.0 Scope</b>	<b>4</b>
<b>3.0 Record Keeping</b>	<b>4</b>
<b>4.0 Overview</b>	<b>5</b>
<b>5.0 Commitment</b>	<b>5</b>
<b>6.0 Accountability</b>	<b>6</b>
<b>7.0 Involvement</b>	<b>7</b>
<b>8.0 Training and Education</b>	<b>8</b>
<b>9.0 Assessment and Analysis</b>	<b>8</b>
<b>10.0 Evaluation</b>	<b>9</b>
<b>11.0 Improvement</b>	<b>11</b>
<b>12.0 Reporting System</b>	<b>12</b>
<b>13.0 COVID 19 Pandemic Safety</b>	<b>14</b>



## **GLOSSARY OF ABBREVIATIONS AND ACRONYMS**

<b>ACRONYM/ABBREVIATION</b>	<b>DEFINITION</b>
AR	Army Regulation
CDC	Centers for Disease Control
COR	Contracting Officer's Representative
CORP	Corporation
DA	Department of the Army
DWC	Department of Workers Compensation
EHSS	Environmental Health Safety System
FAR	Federal Acquisition Regulation
GSA	General Services Administration
GTSSP	Gemini Tech Services Safety Plan
HQ	Headquarters
IAW	In Accordance With
IOP	Internal Operating Procedures
NFPA	National Fire Protection Association
OCIR	Owner's Critical Information Requirements
OSHA	Occupational Safety and Health Administration
PDSA	Plan, Do, Study and Act
PM	Program Manager or Project Manager
PWS	Performance Work Statement
QCSP	Quality Control Safety Program
SBS	Support Base Services
SE	Senior Employee
SF	Safety Form
SOP	Standard Operating Procedure
SWOT	Strengths, Weaknesses, Opportunities and Threats



## **1.0 Purpose**

The purpose of the Gemini Tech Services, LLC (GTS) Safety Plan (GTSSP) is to provide safety policies and procedures to GTS personnel and reduce injuries and illnesses through preventative measures. It is a written document that describes the process for identifying the physical and health hazards that can harm workers, pinpoint procedures to prevent accidents, injuries, and determine what steps to take when accidents/injuries occur. GTS is committed to reducing work-related injury & illness that will lead to increased productivity. This GTSSP outlines the Environment, Health and Safety (EHS) requirements and guidelines.

## **2.0 Scope**

This GTSSP defines and states formal expectations in management and employee safety and health performance. It also demonstrates management commitment to safety and health. GTSSP procedures outline responsibilities for occupational safety and health and it provides general safety measures. The objective of the GTS Safety Program is to help prevent workplace injuries, illnesses, and fatalities by doing the following:

- a. Maintain a safe and healthy workplace for all employees in compliance with all policies, procedures, and regulations.
- b. Establish safety and health objectives.
- c. Promote a positive attitude towards safety.
- d. Provide oversight, management for employees and require all to take responsibility and ownership of safety inside and outside the workplace.
- e. Assure compliance with safety, health, and security programs and practices.
- f. Provide training opportunities to employees to better educate them on safety requirements and compliance with OSHA established guidelines.
- g. Regularly review and evaluate safety, health, and environmental, procedures, and practices to assure that they are effective and up to date.
- h. Assure timely and thorough reporting and investigation of all injuries/accidents/incidents and targeted illnesses including the identification of causal factors and the establishment of effective corrective actions.

## **3.0 Record Keeping**

The documents and records developed and used in the GTSSP identify how GTS evaluates, records, and tracks all safety requirements. All records shall be maintained at Gemini Tech Services' Corporate Headquarters and / or posted on the Gemini Tech Services' web site behind a password protected firewall accessible to Government Agencies and GTS employees for inspection.



## 4.0 Overview

It is the mission of Gemini Tech Services to safely provide services to our valued customers, by incorporating cutting-edge technologies, management, leadership, employee ownership, and progressive strategies to enhance profits for our organization and our business partners. Because of this, GTS places a high value on Environmental, Health and Safety. The key to effective safety is to properly oversee, review and evaluate without imposing undue levels of control, layered decision-making and approvals that can affect performance. It also means utilizing safety processes and procedures that are based on commitment, accountability, involvement, education/training, assessment/analysis, evaluation, and improvement.

## 5.0 Commitment

At Gemini Tech Services, LLC., our employees are our most important resource. The safety and health of our employees is vitally important to the success and survival of the organization. Therefore, every level of management, from the top on down, and all employees must be committed to safety as a core professional value integrated into the fabric of our corporate culture. Because of this we are dedicated to the following safety standards:

- a. Managers at all levels will do everything possible to prevent workplace accidents; we are committed to providing a safe working environment for all employees.
- b. We share a personal and professional commitment to protecting the safety and health of our employees, our contractors, our customers, and the people of the communities in which we operate.
- c. GTS Corporate not only takes responsibility for our own safety but also for everyone throughout our organization.
- d. We encourage each employee to recognize and correct potential hazards.
- e. We demand that each employee speak up and stop work if safety is compromised.
- f. GTS Corporate requires that places of employment be free from recognized hazards that are causing or are likely to cause death or serious physical harm to GTS employees.
- g. We comply with OSHA standards.
- h. PPE will be furnished when necessary.
- i. We ensure that all GTS employees understand the importance of meeting customer, regulatory and legal requirements.



- j. Corporate Headquarters monitors each project to ensure that processes and procedures are being implemented.
- k. We continuously stay engaged on all safety issues through performance feedback mechanisms, inspection results, observations, noted deficiencies and other information.
- l. Corporate Headquarters interfaces with Government stakeholders regarding performance and/or potential safety issues relevant to Government provided facilities that GTS employees occupy during performance of a contract.
- m. We always ensure the availability of necessary resources.

## **6.0 Accountability**

All employees are considered safety managers and are empowered to identify safety issues, report them, then recommend corrections or improvements. Employees must understand and adhere to their health and safety responsibilities. Each employee will be given the means, training, and authority necessary to enable them to satisfy their requirements, including personal protective equipment (PPE).

PMs, Leads and SEs are safety coordinators for their projects. Therefore, they are responsible for distribution of safety publications and materials to employees on the project. They are also responsible administering all safety reporting to GTS Corp HQs. To create and maintain a “world-class” safety and health climate in our company and provide top notch services, GTS employees are accountable in the following manner:

- a. The GTS Safety Manager is responsible for informing managers and employees of the provisions of the GTSSP.
- b. PMs, Leads and SEs will conduct initial and periodic safety assessments of the work site to mitigate hazards that may affect GTS employees.
- c. PMs, Leads and SEs are in charge of training each worker in the hazards and controls associated with their work site and work areas.
- d. GTS Leaders at all levels will evaluate the safety performance of all workers through the continual surveillance and coaching of employees for a safe work environment.
- e. PMs, Leads and SEs will assist the GTS Safety Manager in recognizing employees who perform safe and healthful work practices.



- f. PMs, Leads, and SEs will provide additional training, increased safety observation and coaching to workers whose safety performance is deficient. The GTS Safety Manager has training oversight.
- g. GTS Corporate Executives hold the authority for disciplining workers for failure to comply with safe and healthful work practices. Leaders at all levels are responsible for providing input when necessary.
- h. All employees are responsible for responding to their supervisor efforts to ensure compliance of environmental, health, safety, and contractual and regulatory requirements.
- i. Every employee is part of the project's safety committee and are encouraged to make suggestions and recommendations to the Safety Coordinator (PMs, Leads and SEs) to enhance the overall safety operations of the project (contract).
- j. Each employee shall comply with OSHA rules and policies, regulations, and orders issued pursuant to this Act, which are applicable to his/her own actions and conduct.

## **7.0 Involvement**

The GTS Safety Program is a managerial process that: operates an effective and structured Environmental, Health and Safety System (EHSS) that is fully capable of meeting policies, procedures, and regulations, in regard to the health and safety of its employees, customers and business partners. The EHSS provides a systematic program for assessing compliance with performance objectives and standards. The EHSS includes methods and procedures for scheduling, conducting, and documenting EHS inspections.

Specific processes and tools for measurement, analysis and improvement include inspection worksheets, inspection schedules and frequencies that have been developed to assess OSHA performance and compliance. EHS inspections are expected to identify endangerment to life and or physical safety of any individual to prevent accidents, avoid illnesses and preserve the life of the individuals. GTS continually develops safe work practices; proper use, care, and maintenance of tools and equipment; and known hazards in work areas. PMs, Leads and SEs are required to continually assess hazards in the workplace and report them immediately and/or on the Monthly Progress Report (MPR) depending on the severity of the hazard.

MPRs are assessed at Corp HQs to determine whether physical inspections or other means of surveillance is necessary. Furthermore, GTS safety leaders at all levels have a commitment to collaborate and work closely with local work site safety officials. Cooperation with safety officials of our business partners is also necessary during prime contractor and subcontractor relationships.

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## 8.0 Training and Education

The GTS Corporate Safety Manager must attend and successfully complete OSHA training. The GTS Safety Manager is responsible for administering the Corporate Safety Training Program. PMs, Leads and SEs are responsible for ensuring that employees are trained and educated on the safety programs that are administering at their work locations (military installations, cities, towns, federal buildings, state buildings). Project or contract specific safety training will be managed by PMs, Leads and SEs with close oversight by the Safety Manager.

OSHA compliance training, custom training, and best practices training may be conducted on a case-by-case basis. EHS training helps prevent work-related injuries and illnesses. EHS training also encourages workers by educating and empowering them to advocate for safer working conditions. PMs, Leads, and SEs may be required to conduct safety training during initial orientation, on the job training (OJT), tailgate training, refresher training and when a new hazard is introduced to the worksite or geographic location. At a minimum, GTS Personnel will also be trained in the following areas:

- a. How to identify the safety and health problems at the workplace.
- b. How to analyze the causes of these safety and health problems.
- c. How to bring about a safer and healthier workplace.
- d. How to involve all employees to achieve all of the above.

## 9.0 Assessment and Analysis

GTS will continually identify methods to assess, analyze and control hazards and unsafe work practices. PMs, Leads, and SEs must conduct periodic surveys of workplaces and employees. Interview employees to gather critical feedback. Examine workplace hazards and unsafe work practices then determine corrective actions where needed. PMs, Leads, and SEs should maintain detailed (site specific) inspection procedures. The GTS Corporate Safety Committee consists of the Safety Manager and all PMs, Leads and SEs. Formal Safety committees should be established on major projects (where having everyone on it is not feasible) as well. To adequately perform assessments and conduct analysis, managers at all level should maintain an understanding of the following:

- a. **Safety Climate.** Conduct employee surveys to determine their perceptions of the project's safety and health climate, or "the way things are around here." The results of



the survey will uncover weaknesses in the current safety and health system and should be discussed directly with the employer.

- b. **Safety activities.** What are the safety activities you are currently conducting? Which activities are working, and which appear to be ineffective? Safety activities include safety training, safety meetings, safety recognition and incentive programs.
- c. **Equipment.** Make a list of your major equipment, principal operations, and locations. Special attention should be given to inspection schedules, maintenance activities, and plant and office layouts.
- d. **Employee Capabilities.** Make an alphabetical list of all employees, showing the date of hire, job description, and experience and training for the purpose of evaluating safety training needs and future safety committees. Special attention should be given to new employees and to employees who are physically and/or mentally challenged.
- e. **Injury and Illness History.** Analyze your first-aid cases and OSHA 200 Log recordable injuries and illnesses. Give special attention to recurring accidents, types of injuries, etc. Review your workers compensation insurance experience modification rate, as this compares your company's loss experience with that of other employers in similar industries.

## 10.0 Evaluation

GTS's commitment to ensuring continual safety program improvements relies on the ability of managers and leaders at all levels to conduct initial and periodic evaluations. Initial evaluations are done to determine weaknesses and devise improvements that will effectively strengthen them. To achieve this PMs, Leads and SEs should use the following "gap analysis" process.

- a. Know where you are now – analyze the project's current program.
- b. What does your safety recognition program look like now? Use Surveys and Interviews.
- c. Decide where you want the project's safety program to be – look for benchmarks.
- d. What do we want the safety program to look like? It should augment local safety programs.



- e. Review this policy, local policies publications and network with other leaders and local safety officials.
- f. See the gap (between where you are and where you need to be) – evaluate to determine how far you will have to jump.
- g. How does your program measure up to benchmark programs that you research?
- h. Develop or adopt evaluation criteria for rating the project’s program.
- i. Determine your ability to jump the gap - SWOT analysis.
- j. Determine program Strengths and Weaknesses.
- k. Determine Opportunities for, and Threats to improvement.
- l. Jump the gap – use the PDSA process to make improvements.
- m. Write the Plan, Do the plan, Study the plan, Adopt/Abandon

Another primary method of evaluation is the PMs, Leads and SEs completing a thorough review of OSHA requirements with the GTS Corporate Safety Manager to ensure all services described in the task order are addressed. This evaluation helps to identify hazards in the workplace and make improvements to the health and welfare of GTS employees. The following is an additional method of evaluation that will be used in our proactive approach to identify, prevent, and correct safety concerns and hazards in the workplace:

n. Visual

Visual inspections are predominantly “walk through inspections” in which management will identify and note possible deficiencies, safety issues, hazardous concerns and correct them on the spot. These should occur both during work in progress and after a task is completed. Types of visual inspections include:

- 1) Random.
- 2) 100 Percent inspection.
- 3) Continuous.
- 4) Analytical



Analytical inspections involve the review of documentation and data found in Osha reports, DOD reports, GTS Corporate reports.

## 11.0 Improvement

Project safety coordinators and safety committees are the keys to improving safety in the workplace. The PDSA Improvement Cycle is depicted below to guide managers and employees with implementing safety plan improvements:

- a. Step 1: Plan – Design the safety change
  - 1) Purpose: Take time to thoroughly plan the proposed change before it is implemented.
  - 2) Pinpoint specific conditions, behaviors, results you expect to see as a result of the change.
  - 3) Plan to ensure successful transition once the change is implemented.
- b. Step 2: Do - Carry out the safety change
  - 1) Purpose: Implement the change on a small scale if able to.
  - 2) Educate, train, and communicate the change. Ensure that all team members completely understand the safety change.
  - 3) Keep the change small to better measure variable.
- c. Step 3: Study – Examine the effects or results that making the change. Is the workplace safer?
  - 1) Purpose: To determine what was learned: what went right or wrong.
  - 2) Statistical process analysis, surveys, questionnaires, interviews



d. Step 4: Act – Adopt (if the safety change is successful), abandon (if the change did not result in a safer environment) or repeat the cycle (seek other ways to positively effect the hazard).

- 1) Purpose: Incorporate what works into the system.
- 2) Ask not only if you are doing the right things but ask if you are doing things right.

## 12.0 Reporting System

The GTS reporting system consisting of incidents/accidents reporting standards and guidelines for employee hazard reporting will be kept at all project locations so that they are known to all employees. The reporting system is flexible enough to encompass requirements of all projects. It also allows for the reporting of physical and behavioral hazards. PMs, Leads, and SEs must actively encourage use of the system and ensure employees feel comfortable using the system in all situations. The GTS reporting system provides for data collection and display as a means to measure the success of the GTS Safety Program in resolving identified hazards. Specifically:

### a. Hazard Reporting

- 1) Workplace hazards will be reported immediately to Safety Coordinators (PMs, Leads and SEs) and to the GTS Safety Manager.
- 2) Workplace hazards will also be reported to external Safety officials at project locations after they are reported to GTS.
- 3) Safety Coordinators involve employees in correction planning, as appropriate.
- 4) Safety Coordinators will provide rapid and regular feedback to project employees on the status of evaluation and correction of the reported hazard.
- 5) Safety Coordinators will collaborate with the GTS Safety Manager and external local safety officials to ensure appropriate corrective action is taken promptly on all confirmed hazards.



- 6) Interim corrective actions are taken immediately by Safety Coordinators on all confirmed hazards where delay in final correction will put employees or others at risk.

b. Employee Incident/Accident Reporting

- 1) Employees will notify Project Managers, Leads, or Senior Employees immediately (within 5 minutes) of any injuries/ accidents (5 W's – who, what, where, when, why).
- 2) Employees will provide specific information on injuries/ accidents they experienced or witnessed to their Manager, Lead, Supervisor, Senior Employee and GTS Corp HQ (Human Resources or Safety Manager), to assist with completing the injury/accident/incident report.
- 3) Reporting persons will follow all environmental, health and safety reporting procedures and complete training when required.
- 4) Reporting persons will follow all safety and vehicle reporting and operating requirements and complete training when required.
- 5) All employees will operate vehicles safely, in accordance with local driving laws and regulations.

a. Safety Coordinator Incident/Accident Reporting

- 1) Safety Coordinators (PMs, Leads and SEs) are identified leaders who must provide initial verbal notification of any injury/accident/incident involving a GTS employee to GTS Management (Human Resources or Safety Manager) immediately, with details of injury/accident/incident and if those involved require medical attention.
- 2) The leaders identified in subparagraph a. must use the 5-W's format (Who, What, Where, When, Why) while submitting the initial verbal support.
- 3) Safety Coordinators must follow-up by completing and submitting a detailed injury/accident/incident report for GTS employees under their supervision or administrative control who have experienced an injury/accident.
- 4) Safety Coordinators supporting DOD customers must ensure that the Standard Form 91 (SF91) (Motor Vehicle Accident Report), if applicable, is prepared and forwarded as specified for the contract or to the Contracting Officer or COR (at the minimum) as well as to GTS Corp HQ (Operations Manager or



Safety Manager) within 2 hours. A blank SF91 will be maintained in each vehicle operator's book/binder. If the Military Police (MP) is called to the accident scene then they should sign the SF91. Additionally, if other vehicles are involved in the accident then additional information must be gathered, i.e., names, license number, insurance information, etc. The GTS Supervisor / Lead must collect written statements of witnesses and those involved.

- 5) Safety Coordinators must also notify GTS Management with details of the injury/accident/incident NLT 30 minutes after the injury/accident/incident in order for proper coordination to commence.
- 6) Safety Coordinators must always take photos of the accident scene and include the damage to vehicle(s) and property, gather statements from witnesses of those involved, complete SF91 (if applicable to the project), collect any traffic citations, gather other important information/documentation, and provide to the GTS Management for evaluation and determination of responsibility.
- 7) Safety Coordinators are required to participate in an injury/accident investigation as requested.
- 8) Furthermore, if a GTS employee is injured, appropriate Workers Compensation documentation may have to be prepared by PMs, Leads or SEs and coordinated with GTS HR.
- 9) Finally, PMs, Leads and SEs are expected to collect written statements of witnesses and those involved in the injury/accident/incident. Submit (email) all documents, 5W's, Statements, SF91, Statement, witness statements, OCIR, pictures and any other documentation/information to GTS Corp HQ.
- 10) Examples of various reporting documents are explained in this Safety Policy. Actual documents should be accessed, filled out appropriately, printed, and submitted.

### **13.0 COVID 19 Pandemic Safety**

COVID 19 is a respiratory illness that can spread from person to person. It spreads between people who are in close contact with one another (within about 6 feet) and through respiratory droplets produced when an infected person coughs or sneezes. Symptoms can include fever, cough, or difficulty breathing, which may appear 2-14 days after exposure. Since it is a new disease, doctors and scientist are constantly discovering new things about it and implementing new ways to fight it. CDC is constantly issuing new guidance to businesses in order to protect

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the workforce. This means that GTS will continually provide updates to employees, PMs, Leads and SEs in order to ensure that workplaces remain as safe as possible. GTS COVID 19 guidance is not all conclusive and is meant to augment any local project or worksite guidelines given by our customers or stakeholders. All GTS employees will adhere to the following standards:

- a. Employees who feel sick with COVID 19 symptoms or have come in contact with someone who is positive with the COVID 19 virus, should not report to the worksite, notify the PM, Lead or SE, and immediately start to isolate. Employees who are already at the worksite and begin to feel sick with COVID 19 symptoms will notify their supervisors (by email or phone call) and immediately go home to begin isolation.
- b. Isolating employees should contact their medical provider to schedule a COVID 19 test as soon as possible. Immediately start following the latest CDC guidance pertaining to social distancing, mask, gloves, and sanitation.
- c. Isolating employees will immediately contact the PM, Lead or SE to coordinate PTO, Sick Leave, Telework or Leave Without Pay.
- d. PMs, Leads and SEs are responsible for verbally reporting employees in COVID 19 isolation status to the Operations Manager immediately. Subsequently, PMs, Leads and SEs will solicit required information to fill out the GTS Worksite Contact Tracing Questionnaire then submit it to the Safety Manager and HR Administrator as soon as possible.
- e. PMs, Leads and SEs will continue to report updates of the employees testing results, isolation/quarantine situation and return to work status to the Operations Manager, Safety Manager and HR Administrator.
- f. Employees will adhere to local and Project specific guidance as it pertains to telework, testing, isolation and return to work. Employees will adhere to the latest CDC guidelines when local and Project specific guidance does not apply.

## **14.0 Forms and Documents**

GTS is committed to tailoring reporting requirements based on the requirements of its customers, stakeholders, and business partners. While the basic standard of reporting (who, what, where, when and why) never changes, each project may be different in regard to additional reporting requirements. Safety Coordinators have the responsibility of knowing what those additional requirements are as well as where to access the forms and documents for reporting. Most forms can be found on the internet. The following list depicts forms and documents that may be used for reporting.

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- a. **GTS SF-1** Contact Tracing Questionnaire is used by all projects to report COVID 19 virus exposure and can be obtained from Corporate Headquarters.
- b. **DA Form 4755-** Employee Report of Alleged Unsafe or Unhealthful Working Conditions is used by projects supporting the Department of the Army. The form is used to report unsafe or unhealthful conditions in the workplace. The form can be accessed at DA FORM 4755 - Army Publishing Directorate - Army.milarmypubs.army.mil › Product Maps › PubForm › Details.
- c. **GSA Form 3592-** GSA Employee Report of Unsafe or Unhealthy Working Conditions is used by projects supporting GSA. The form is used to report unsafe or unhealthful conditions in the workplace. The form can be accessed at <https://www.gsa.gov/forms-library/gsa-employee-report-unsafe-or-unhealthy-working-conditions>.
- d. **OSHA Form 300-** Log of Work-Related Injuries and Illnesses is used by all projects to record all reportable injuries and illnesses that occur in the workplace, where and when they occur, the nature of the case, the name and job title of the employee injured or made sick, and the number of days away from work or on restricted or light duty, if any. The form can be accessed at <https://www.osha.gov/recordkeeping/RKforms.html>.
- e. **OSHA Form 300A-** Summary of Work-Related Injuries and Illnesses is used by all projects to show a summary of all work-related injuries and illnesses beyond each individual case. On this form, days away from work, the number of cases and injury or illness are added up for a grand total. The form can be accessed at <https://www.osha.gov/recordkeeping/RKforms.html>.
- f. **GTS SF-3-** Employee's First Report of Injury is used by all projects to capture details of injury, illness or near miss in the workplace. The form focuses on who, what, where and why. The form can be obtained from GTS Corporate Headquarters.
- g. **GTS SF-4-** Employee Report of Unsafe or Unhealthy Working Conditions is used by all projects. The form is used to report unsafe and unhealthy conditions in the workplace. The form can be obtained from GTS Corporate Headquarters.
- h. **GTS SF-5-** GTS Safety Policy Acknowledgement Form is used by Project PMs, Leads and SEs on all projects. The form is used to capture signatures from employees indicating that they have read and understand the company's safety policy.