2010

Fair Labor Association
Independent External Monitoring Report

COMPANY: Herff Jones
COUNTRY: United States
FACTORY CODE: 1700821256I
MONITOR: Accordia Global Compliance Group
AUDIT DATE: February 12, 2010
PRODUCTS: Fine Paper Announcements
PROCESSES: Press, Offset, Binding, Foil, Dye, Panel
NUMBER OF WORKERS: 65

For an explanation on how to read this report, please visit the FLA website here.

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CONTENTS:

Code Awareness:.....3
Health and Safety: General Compliance Health and Safety 4
Health and Safety: Evacuation Requirements and Procedure.....5
Health and Safety: Safety Equipment and First Aid Training.....6

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Code Awareness:

GEN.3 Develop a secure communications channel, in a manner appropriate to the culture and situation, to enable Company employees and employees of contractors and suppliers to report to the Company on noncompliance with the workplace standards, with security that they shall not be punished or prejudiced for doing so.

Noncompliance

Explanation:	Monitor did not find a secure communications channel in place at the facility to allow reporting to Herff-Jones on issues related to the Standard/Code. Worker interviews with a sample of 10 did not reveal that there is a method to contact the company with issues related to compliance to the code.
Plan Of Action:	An electronic suggestion box is available to all employees as a secure, non-threatening means of communicating to management. Weekly department meetings and monthly plant meetings are regularly held. With regards to confidential matters or counseling, the local HR Manager serves as an employee advocate and assures that the ongoing communication with our employees supports the company's belief in creating an atmosphere of employee ownership, and maintaining open and honest lines of communication.
Deadline Date:	03/17/2011
Action Taken:	
Plan Complete:	No
Plan Complete Date:	

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Health and Safety: General Compliance Health and Safety

H&S.1 Employers shall comply with all local laws, regulations and procedures concerning health and safety. (S)

Noncompliance

Explanation:	Facility has not conducted training in Control of Hazardous Energy/Lock Out-Tag Out since 2005. (29CFR1910.147) Monitor found through review of training documentation and interviews with workers, including maintenance and machine operators, and management, that training in Control of Hazardous Energy has not been conducted annually as required by OSHA.
Plan Of Action:	Training was conducted by Cornerstone Environmental Services January 11-12, 2011. [Employee name], Safety Director, to ensure training is conducted annually.
Deadline Date:	03/17/2011
Action Taken:	
Plan Complete:	No
Plan Complete Date:	

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Health and Safety: Evacuation Requirements and Procedure

H&S.9 All applicable legally required or recommended elements of safe evacuation (such as posting of evacuation plans, the installation and maintenance of an employee alarm and emergency lighting systems, ensuring aisles/exits are not blocked and that workers are not blocked within their workstations, employee education, evacuation procedures, etc.) shall be complied with. Workers shall be trained in evacuation procedures. Alarm systems shall be regularly tested and evacuation drills shall be undertaken at least annually. (S)

Noncompliance

Explanation:	a) Facility has not conducted an emergency evacuation drill within the past 12 months according to management and worker interviews. b) Evacuation plan posting is not updated to reflect the re-organization of the factory that resulted from the transfer of equipment from [City name] factory. c) Emergency exit and aisles were found partially blocked in the warehouse. One area at northeast corner of warehouse and one at northwest area of warehouse found with restricted/limited path of egress. Cardboard cases of product and steel/wood shelving materials were found that restricted the aisles to less than the 36 inch width required by fire code.
Plan Of Action:	a) Emergency evacuation drill was conducted January 19, 2011. b) Updated evacuation plan and routes completed January 18, 2011. c) All aisles and emergency exits noted have been cleared and additional emergency signage added in the East Warehouse. Safety Committee members conduct weekly walkthrough to ensure compliance. [Employee name], Safety Director, to ensure evacuation drill is completed annually.
Deadline Date:	03/17/2011
Action Taken:	
Plan Complete:	No
Plan Complete Date:	

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Health and Safety: Safety Equipment and First Aid Training

H&S.10 All safety and medical equipment (such as fire fighting equipment, first aid kits, etc.) shall be available in sufficient numbers throughout the factory, maintained and stocked as prescribed and easily accessible to workers. A sufficient number of workers shall be trained in first aid and fire fighting techniques. (S)

Noncompliance

Explanation:	Monitor found that fire extinguisher training was most recently conducted in 2006 and not updated since that time. Annual training is required by OSHA 29CFR1910.157.
Plan Of Action:	Fire extinguisher training will take place June 2011. [Employee name], Safety Director, will ensure fire extinguisher training occurs annually. Fire extinguisher training actually took place for entire factory on August 25, 2011. It is also on schedule to be done yearly as a review in August and new hires will go through entire training video upon hiring.
Deadline Date:	08/25/2011
Action Taken:	
Plan Complete:	No
Plan Complete Date:	