

National Client, LLC

2020

Loss Control Survey Report
Summary of Findings



National Client, LLC

Any Street ,

Suite 1

Any Town, USA 12345

1/1/2020

SCOPE:

AXIA Risk Management Services conducted five Loss Control Surveys of National Client, LLC locations in State on 01/01/XX and 01/02/XX to evaluate hazards and exposures associated with the locations listed below:

1	Location 1	Any Street	Any Town	US	12345	01/01/XX
2	Location 2	Any Street	Any Town	US	12345	
3	Location 3	Any Street	Any Town	US	12345	
4	Location 4	Any Street	Any Town	US	12345	01/02/XX
5	Location 5	Any Street	Any Town	US	12345	

The purpose of these Loss Control Surveys was to identify any additional exposures that may not be part of existing National Client, LLC safety and security protocols and is also intended to provide information in order to formulate baselines for exposure mitigation as well as put forth applicable recommendations.

The survey process was primarily focused in three major areas:

- *General Liability,*
- *Workers Compensation and*
- *Property (Fire).*

For each location, an interview was conducted with the local manager on duty asking specific questions for the topics listed below and followed by a physical survey of the location:

- *General Liability/ Loss Prevention*
- *Customer Safety*
- *Liquor Liability/ Assault & Battery*
- *Worker Safety and*
- *Property (Fire Prevention)*

This Loss Control Report only identifies general hazards that were observed during the survey and is divided in three sections:

- *Exterior Loss Exposures,*
- *Interior Loss Exposures – Front of the House and*
- *Interior Loss Exposures – Back of the House.*

The **Executive Summary** on the next page consolidates the findings from our high-level claims review and includes the field result Observations and Proposed Safety Strategy for your consideration to be implemented as part of the National Client, LLC Risk Mitigation Program moving forward.

Specific Audit Findings and Physical Exposure Items that were observed at individual locations during the survey process are reported in the attached reports. These items were identified as possible loss exposures with attached informal recommendations submitted for each item for your consideration.

This confidential report was developed for the exclusive use of National Client, LLC and will not be shared with any other entity unless specifically approved.

EXECUTIVE SUMMARY:

Overall, there we no consistent major physical hazards or exposures noted during the surveys of these five locations that would be considered to adversely affect the insurability of the enterprise. All of the store locations appeared to be maintained, efficiently operated and adequate controls were found to be in place to control most of the exposures identified.

However, in order for National Client, LLC to reach its next stage growth in achieving a corporate environment of sustained safety and economic efficiency a more targeted approach is deemed necessary in specific target areas.

These areas were identified from the specific location surveys and as a result of a high level analysis of the loss history for the last two years:

<i>As of 01/01/XX</i>	20XX		20XX	
Cause of Loss	Total Claims	Total Incurred	Total Claims	Total Incurred
Slip /Trip/Fall	XX	\$ XXX,XXX	XX	\$ XXX,XXX
Lifting/Moving-Other	XX	\$ XXX,XXX	XX	\$ XXX,XXX
Struck By Object/ Struck Against	XX	\$ XXX,XXX	XX	\$ XXX,XXX
Burn	XX	\$ XXX,XXX	XX	\$ XXX,XXX
TOTALS	XX	\$ XXX,XXX	XX	\$ XXX,XXX

The results show that the above Four Causes of Loss categories are responsible for 75% of the Total Amount Incurred (\$XXXXXX dollars) and 62% of the Total Claims (126 claims) for National Client, LLC

In addition, results from the field surveys of the five locations have yielded 16 observations that are directly related to loss causation. These areas of loss causation are as follows:

OBSERVATIONS:

XX-08-01 – Safety Topic(s) Reinforcement: Safety topics that directly affect the local store and/or Corporate Safety Initiatives should be discussed at each shift meeting in addition to other topics.

★ **XX-08-02 – Accident & Incident Investigation:** A formal procedure should be put in place to provide regional and local management with all losses that occurred at their locations. Local management should be required to review all the accidents/incidents and investigate them to develop loss mitigation techniques for future accidents. Collection and securing of physical as well as photographic evidence should also be implemented as part of the accident and incident investigation process.

XX-08-03 – Anti-Slip Mat Policy-Front of House: A formal policy/procedure for the use of matting in customer service areas should be implemented to reduce the existing Slip & Fall Exposures. The policy should include the specific area coverage, placement, inspection, maintenance and replacement once the mats are deemed as unserviceable.

★ **XX-08-04 – Daily Inspection Training:** Additional training should be provided to local Managers to educate them on how to conduct their daily inspections to identify exposures and safety hazards that have a potential for a loss. The list of auditable items should be expanded to reflect a more comprehensive inspection process.

XX-08-05 – Food & Beverage Spills: A formal procedure should be implemented and provided to each location for use during food and beverage spills. These procedures should be reviewed at all shift meetings until all associates are aware of the required actions and they become routine.

★ **XX-08-06 – Floor Cleaning Procedures:** The existing floor cleaning protocol should be re-evaluated for adequacy and changes made to mitigate the existing Slip & Fall exposures. This re-evaluation would include the use and maintenance of authorized cleaning equipment, cleaning chemicals and cleaning techniques for the Front of the House as well as the Back of the House.

★ **XX-08-07 – Freezer Door Inspection and Maintenance Policy:** The existing freezer doors observed were found to be damaged from normal wear and tear. This condition allows moist air to enter the freezer area condensing into ice and creating a Slip & Fall Hazard for employees using this equipment. Some of the doors observed were also off balance creating the need for excessive force to open and close same. A formal policy for inspection and maintenance of all freezer doors should be put in place across the enterprise.

XX-08-08 – Foreign Object in Food Policy: A formal policy/procedure should be developed on how to handle foreign object in food incidents which includes obtaining possession and segregation for insurance company investigators and claim personnel.

★ **XX-08-09 – Personal Protective Equipment Policy:** The existing PPE policy needs to be re-developed / reinforced for all employees to include such items as: the use of type of authorized PPE, for what purposes the PPE is intended, storage, maintenance and replacement of the equipment for the Back of the House. The use of PPE should be enforced by local Management and be part of the topics to be discussed during Shift Meetings.

XX-08-10 – Trash Handling Procedure: A formal policy/procedure should be developed to handle trash handling while using Personal Protective Equipment (*leather gloves*) that is strategically located for easy access. The use of PPE should be enforced by local Management and be part of the topics to be discussed during Shift Meetings.

★ **XX-08-11 – Hot Oil and Grease Removal Procedure:** A formal policy/procedure should be developed to handle hot oil and grease from all the locations. Consideration should be given to performing Job Safety Analysis on this task and developing safe handling procedures which include PPE.

XX-08-12 – Anti-Slip Matting Policy-Back of the House: A formal policy/procedure policy should be developed and implemented for each concept based on a needs requirement analysis including, inspection, areas of use, maintenance and replacement once the mat is no longer serviceable.

★ **XX-08-13 – Step Stools & Ladders:** A formal policy should be put in place for the use, inspection, maintenance and procurement of commercially rated Step Stools & Ladders that include a large work platform and an extended guard rail.

★ **XX-08-14 – Material Handling Policy:** The current material handling policy should be re-evaluated and protocols implemented to reduce this exposure. The policy should take into consideration such factors as weight and bulkiness of the commodity being handled, storage areas, use of ladders, confined spaces and other ergonomic variables.

XX-08-15 – Knife Equipment Policy: A formal policy/procedure should be developed to ensure a standardized approach to the use, procurement, inspection, maintenance and replacement of Knives.

★ **XX-08-16 – Rack Storage Policy:** A formal policy/procedure for the use of storage racks throughout the entire BOH. Management should include this as part of their daily inspection protocol and take appropriate action once violations are identified.

XX-08-17 – First Aid Kit Policy: A formal policy/procedure should be developed to ensure a standardized approach to the use, procurement, inspection, maintenance and replacement of the First Aid Kits.

NATIONAL CLIENT SAFETY STRATEGY:

Based on the loss analysis and field observations during the surveys, we are suggesting the following Safety Strategy for your consideration moving forward:

1. Develop a Safety Program that is short, easy to use, addresses the actual claims we are seeing in work comp, and can be summarized in a single page.
2. Provide the General Managers with an easier to use Safety & Self Inspection protocols that can be measured.
 - a. *Research and review Electronic Tablet Technology solutions.*
3. Provide training for the Area Directors and General Managers in the implementation and ongoing administration of the safety program.
 - a. *Initiate an Accident Investigation Program to identify root causes of accidents in order to develop better physical and human element controls to mitigate or eliminate future losses*
4. Implement a series of Safety Meetings to include the Area Directors and review their respective worker's compensation losses in the prior period.
 - a. *Recommend a Bi-Monthly Corporate Safety Committee to ensure a consistent message across the enterprise.*
5. Provide statistical analysis feedback to the Risk Management Coordinator so that the progress of the safety program can be monitored.
6. Design and implement a Chargeback System which has the ability to both penalize and reward Area Directors and General Managers for their loss experience.

Sincerely,

Nicholas S. Galakis

President

AXIA Risk Management Services, LLC

8 Wood Hollow Road, Suite 301

Parsippany, NJ 07054

T: (973) 884-4400 ext. 224

F: (973) 884-4419

C: (908) 377-9852

E: nickg@axiarms.com



FINDINGS:**A. General Safety / Loss Prevention**

1	Emergency Lighting	
a.		Is the emergency lighting working and in good repair?
b.		How often is it checked and tested?
c.		What procedure is in place to correct any deficiencies?

Comments: The emergency lighting was operational in all the locations visited. Local management reported that the lighting is part of their site inspection routine. Any deficiencies are reported immediately for repair.

Recommendation: None

2	Claim/Incident Reporting	
a.		Is the manager aware of the difference between a claim and an incident?
b.		What procedures are in place if the manager observes someone fall or become injured while on the premises?
c.		Is the manager familiar with the proper forms and reporting procedures currently in place?
d.		Is the manager required to include a photograph with the claim/incident report? How is this accomplished?
e.		How is this accomplished?

Comments: The staff is fully aware of the accident reporting procedures. For all incidents, the area director is notified and as well as XXX for WC and XXX for GL.

During an injury, the manager on duty is called and provides assistance as warranted, i.e. calling for emergency services. There is no formal procedure to take photographs and collect other evidence of the area where the incident occurred post-accident.

Recommendation: None

3	Shift Meetings	
a.		Do the managers hold up meetings at the beginning of each shift?
b.		Are safety issues discussed at the shift meetings?
c.		Are the meetings documented?

Comments: Shift meetings are conducted, however, safety is not a regular topic that is discussed. Safety meetings are conducted on a monthly basis based on the topic followed off the safety calendar. XXXX has a sign in sheet for the safety meeting attendees. No sign in documentation was observed/reported for XXXX.

Recommendation:

16-08-01 – Safety Topic(s) Reinforcement: Safety topics that directly affect the local store and/or Corporate Safety Initiatives should be discussed at each shift meeting.

4 Training	
a.	To what extent are new employees trained in customer safety and worker safety?
b.	What is the timing of the initial orientation/training?
c.	What follow-up training do employees receive?

Comments: There is a formal orientation and training program in place for all new associates as directed by Corporate XXXX and XXXX. Follow-up training on a monthly scheduled basis to meet CAL OSHA Requirements.

Recommendation(s): None



5 Emergency Evacuation Procedures	
a.	In the event of emergency, what procedures are in place to ensure the swift and orderly evacuation of customers and employees?

Comments: Based on the replies received from most of the Managers interviewed, there is clear understanding of how to conduct an emergency evacuation.

Recommendation: None

6 Prior Losses / Accident Investigation	
a.	Have the losses at this location been reviewed with the manager?
b.	Describe the steps that have been put in place to ensure that such losses are prevented the future.

Comments: Prior loss information was reported as being provided by their Area Director to the local store management. There is no accident or incident investigation being conducted on a local level to ascertain root causation and produce mitigation loss techniques for future use.

Recommendation:

16-08-02 – Accident & Incident Investigation: A formal procedure should be put in place to provide regional and local management with all losses that occurred at their locations. Local management should be required to review all the accidents/incidents and investigate them to develop loss mitigation techniques for future accidents. Collection and securing of physical as well as photographic evidence should also be implemented as part of the accident and incident investigation process.

B. Customer Safety

7	Rain Mats	
a.		What does the general manager do when it rains or snows in terms of dealing with slippery floors as a result of customers tracking in rain snow and ice?
b.		What sort of "mats" are used, when are they put out, how are they cleaned, where are they stored, what condition are they in?

Comments: There was no formal matting policy reported in place for XXXX or XXXX. Observations showed that some locations had matting while others did not. Local store management needs direction on insuring that there are adequate mats to cover pedestrian traffic areas as required during normal and inclement weather conditions. Also, some of the mats observed were found to be damaged or inadequate and deemed unserviceable.

Recommendation:

16-08-03 – Anti-Slip Mat Policy-Front of the House: A formal policy/procedure policy for the use of matting in customer service areas should be implemented to reduce the existing Slip & Fall Exposures. The policy should include the specific area coverage, placement, inspection, maintenance and replacement once the mats are deemed as unserviceable.

8	Repairs and Maintenance	
a.		When a manager observes a condition in which repairs or "out-of-the- ordinary" maintenance is required, what is the procedure that is currently in effect?
b.		Does the manager have the authority to hire local contractors to make repairs and do maintenance?
c.		Do such costs affect his or her P&L?
d.		How long does it typically take to get repairs completed?

Comments: All restaurants reported that in case of maintenance issues, they either call in or enter the maintenance request into the Corrigo Software Maintenance Log for the required issue. Maintenance items are listed in the Corporate maintenance log on a priority basis.

Repairs are performed on a priority basis depending on the nature of the repair. Repairs that will affect Food Safety and/or the "Guest Experience" receive top priority. It is not known if the costs of such repairs affect the local store management P&L.

Recommendation: None

9	Daily Inspections	
a.		What protocol is in place for the manager to inspect the inside of his / her restaurant?
b.		Does this include checking for defective furniture which could lead to an injury?
c.		Does the inspection include the outside of the premises (sidewalks, parking lot, landscaping, etc.)?
d.		Does the inspection include cooking equipment and utensils?
e.		What criteria does the manager use to replace worn/broken/defective equipment and utensils?
f.		Are there budgetary restraints in this regard?
g.		What protocol is in place to document the inspections and reporting the results to the corporate office?
h.		What is the frequency of such inspections?

Comments: For the XXXX locations temperature logs are kept 3x a day but no other daily inspections were observed being documented. For XXXX locations there is a formal daily procedure for local managers to conduct inspections at least twice a day inside and outside their restaurant which includes defective furniture and equipment. All deficiencies are recorded on a form and repairs made as required. What is currently lacking is a better understanding on how to conduct the inspections and what exposures to look for when conducting said inspections.

Additional auditable items in regard to Safety need to be included in the inspection list.



Recommendation:

16-08-04 – Daily Inspection Training: Additional training should be provided to local Managers to educate them on how to conduct their daily inspections to identify exposures and safety hazards that have a potential for a loss. The list of auditable items should be expanded to reflect a more comprehensive inspection process.

10	Food and Beverage Spills	
	a.	What happens when something is spilled on the floor?
	b.	Is there a procedure in effect? Describe it.
	c.	Is it being followed?

Comments: Although each store has procedures in place to handle food and beverage spills there seems to be a general lack of consistency in a formal protocol.

Recommendation:

16-08-05 – Food & Beverage Spills: A formal procedure should be implemented and provided to each location for use during food and beverage spills. These procedures should be reviewed at all shift meetings until all associates are aware of the required actions and they become routine.

11	Line Checks	
	a.	How often does the manager do line checks?
	b.	Is this documented and reported corporately?
	c.	What protocols are in effect to correct any deficiencies the manager finds?

Comments: Line checks are conducted at least twice a day. Temperature logs are recorded as part of daily operations. Any deficiencies are rectified immediately.

Recommendation: None

12	BOH / FOH Mops	
	a.	Does the store maintain separate mops for front of the house and back of the house?
	b.	Are the mops conspicuously marked so as to not be confused?
	c.	Did you personally see the mops?
	d.	Are they kept separate from each other?

Comments: All locations are responsible for their own daily clean-up. There is a “two mop, two bucket” system but one location only had one bucket and mop.

There is a lack of consistency in regards to the method of use, storage and maintenance of the cleaning equipment. Chemical use is also suspect for misuse but could not be confirmed during the visit.

Recommendation:

16-08-06 – Floor Cleaning Procedures: The existing floor cleaning protocol should be re-evaluated for adequacy and changes made to mitigate the existing Slip & Fall exposures. This re-evaluation would include the use and maintenance of authorized cleaning equipment, cleaning chemicals and cleaning techniques for the Front of the House as well as the Back of the House.

13	Restrooms	
a.		What is the position of the towel dispenser and / or hand dryers relative to the washbasins?
b.		Are these configured in a way that would contribute to wet floors?
c.		Does the manager have a procedure for checking the condition of the bathroom floors on a periodic basis during business hours?
d.		How often is this done and who actually performs the inspections?
e.		What happens if an employee notes a wet floor?

Comments: Restrooms were observed to be clean with dry floors and operational equipment. Restroom configurations were adequately configured to reduce wet floors from normal use. There are regularly scheduled inspections by staff and all wet floors noted are reported to management immediately with appropriate action taken to reduce loss exposures. Enhanced training needs to be conducted since several loose toilet seats were observed.

Recommendation: None

14	Refrigeration	
a.		Does the manager have a protocol in effect to check the temperature of his / her refrigeration units?
b.		What is the temperature standard that is in effect?
c.		How often is this done?
d.		Is this information communicated corporately?
e.		What protocols are in place to correct the deficient situation?

Comments: There are adequate protocols in place to control this exposure at all locations. There is a temperature standard for freezers which is minimum 0°F and <40°F for normal refrigeration. Unit temperatures are checked daily at regular intervals. In case of a deficiency, the local refrigeration service contractor is notified immediately for repairs.

One redundant issue observed during the surveys is that most of the freezer doors were found to have damaged seals, warming coils or off alignment, allowing large amount of moisture to turn into ice and thus create uncontrolled Slip & Fall Hazards as well as difficulty operating the door under normal conditions.



Recommendation:

16-08-07 – Freezer Door Inspection and Maintenance Policy: The existing freezer doors observed were found to be damaged from normal wear and tear. This condition allows moist air to enter the freezer area condensing into ice and creating a Slip & Fall Hazard for employees using this equipment. Some of the doors observed were also off balance creating the need for excessive force to open and close same. A formal policy for inspection and maintenance of all freezer doors should be put in place across the enterprise.

15	Dishwashing	
a.		Does the manager have a protocol in effect to check the temperature of the water in the dishwashing machine and contamination content?
b.		What is the frequency of such check?

Comments: Where used, dishwashing water temperatures are checked daily by Managers as part of their daily operational checks and by the operator when changing the main tank. Chemicals are checked by the existing vendor.

Recommendation: None

16	Food Handling / Contamination	
a.		What procedures and protocols are in place regarding "bare-hand" handling of food and beverages?
b.		What training do employees received in proper food handling?
c.		Is this training documented?
d.		When are new employees trained?
e.		What procedures are in place regarding contamination and or foreign objects in ice machines and bins?
f.		Does the Insured retain the services of an independent food handling audit firm?
g.		If so, who is and what is the frequency of such audits?
h.		Are the audits scheduled or unannounced?

Comments: There are adequate controls in place to mitigate this exposure. Training is conducted for all associates and the training is documented. New associates are trained as part of their orientation and specific duties training which is considered to be adequate. Gloves are required for associates as are separate cutting boards and food prep utensils.

Recommendation: None

17	Food Allergy	
a.		What procedures are in place to prevent cross contamination the food prep and cooking areas?
b.		Does the menu contain any cautionary language regarding possible food allergies?
c.		What is the procedure in place when the customer inquiries about food content (peanuts, gluten, etc.)?
d.		Are servers trained in all ingredients?

Comments: There are procedures in place that require separate cutting boards and food prep utensils to prepare and contain different foods. For XXXX there is a procedure in place where the local manager will personally interact with a customer as to the specifics of the meal preparation for special guests. There is an allergen guide (June 20XX) available.

Recommendation: None

18	Cleaning Products	
a.		How is daily store cleaning handled, in-house personnel or outside contractors?
b.		What training is available for in-house personnel to clean critical areas such as cleaning surfaces and walkways for guests?
c.		To what extent is anti-slip cleaning/coating compounds used?
d.		If an outside service is used, are certificates of insurance required and on file?

Comments: Daily store cleanup is handled by in-house staff with no standardized protocol. Cleaning products used for cleaning the floor surfaces depends on the type of surface provided in that local store. Other sanitizing/cleaning products are available to associates with adequate MSDS sheets in place.

Recommendation:

A recommendation for this exposure has already been submitted above. (See Rec# 16-08-06).

19	Snow and Ice Removal	
	a.	Describe the procedure or snow and ice removal.
	b.	Is this done by in-house personnel or independent contractors?
	c.	If done by an outside contractor, is a certificate of insurance required and is it on file?
	d.	What procedures are in place for using rock salt or other ice-melting applications?
	e.	What criteria does the manager use to determine when re-salting should be done?

Comments: Not Applicable

Recommendation: N/A

20	Foreign Objects in Food	
	a.	Describe the procedure that is in place if a customer alleges that there is a foreign object in their food.
	b.	Does the procedure require the manager to attempt to take possession of the foreign object?
	c.	What is done with the foreign object once the manager has possession of it?

Comments: In case of an incident, the management on duty is notified to handle the incident directly with the guest. Management attempts to take possession of the foreign object. There is no clear understanding for what to do with the item which has been segregated.

Recommendation:

16-08-08 – Foreign Object in Food Policy: A formal policy/procedure should be developed on how to handle foreign object in food incidents which includes obtaining possession and segregation for insurance company investigators and claim personnel.

21	Defective Furniture	
	a.	What protocols are in place when a customer alleges injury as a result of defective furniture?
	b.	Is the furniture segregated and taken out of service?
	c.	Is the furniture available for inspection by the carrier investigators?

Comments: Should an injury occur then it is reported to Corporate following the normal accident procedure protocol. The alleged damaged furniture item is taken out of service and segregated to be available for inspection by carrier investigators.

Recommendation: None

22	ADA Compliance	
	a.	Is the manager aware of ADA access regulations?
	b.	What steps are in place to make sure that the store is in compliance with such regulations?

Comments: Managers are aware of ADA access regulations. All locations appeared to be in compliance as observed during these surveys.

Recommendation: None

C Liquor Liability / Assault & Battery

23	Certified Training	
	a.	Are all servers required to complete alcoholic beverage service training?
	b.	What is the timing of such training for new associates?
	c.	What follow-up training is the associate required to complete?
	d.	How is the training documented?
	e.	Does the manager offer free taxicab service to intoxicated guests?
	f.	Under what circumstances is the server required to alert the manager of a possible intoxicated customer situation?
	g.	During the past three years, what alcoholic beverage service violations did the store receive?
	h.	How many hours does the bar remain open after the kitchen has closed?
	i.	Is there a procedure in place to cut-off intoxicated guests?
	j.	Describe the procedure.
	k.	Describe precautions in place against serving alcoholic beverages to minors.
	l.	Are electronic ID reading devices used?
	m.	How does the manager prevent legal age customers from surreptitiously passing alcoholic beverages to minors?
	n.	Does the manager employ ID checkers at the door?
	o.	If so, what days and hours?
	p.	Describe the forms of entertainment at the premises and the days and hours the entertainment is available to guests.
	q.	Is dancing allowed?
	r.	What entertainment devices (pool tables, multiple TV screens, video / arcade games, jukebox, etc.) are on the premises?
	s.	Does the manager employ bouncers?
	t.	Off-duty policeman?
	u.	Security guards?

Comments: Not Applicable to the locations surveyed at this time.

Recommendation: None

D. Worker Safety

24	Slip Resistant Footwear	
	a.	Are all associates required to where slip resistant footwear while on the job?
	b.	How does the manager ensure compliance with this requirement?

Comments: There is a formal program in place requiring slip resistant footwear to be worn by all associates. Employees not wearing safety shoes are sent home.

Recommendation: None

25	Cut Proof Gloves	
	a.	Are the kitchen associates required to use cut proof gloves when using knives and other cutting equipment?
	b.	How does the manager ensure compliance with this?

Comments: Cut proof gloves were not observed being available at XXXX but XXXX did have them. Other PPE was observed for both concepts but the enforcement and condition of the equipment was observed to be different based on the concept. XXXX keeps their PPE in a cardboard box.

XXXX PPE was readily available and adequately displayed, however better housekeeping in the storage of PPE should be established as well as an inspection and replacement program.

Recommendation:

16-08-09 – Personal Protective Equipment Policy: The existing PPE policy needs to be re-developed / reinforced for all employees to include such items as: the use of type of authorized PPE, for what purposes the PPE is intended, storage, maintenance and replacement of the equipment for the Back of the House. The use of PPE should be enforced by local Management and be part of the topics to be discussed during Shift Meetings.

26	Bag Openers	
	a.	Are cut proof bag openers used by associates? Describe the device that is used.

Comments: Not Applicable

Recommendation: None

27	Broken Glass	
	a.	Is there a procedure is in place for the removal and disposal of broken glass?
	b.	What is it?

Comments: Due to the nature of the operation, this exposure is limited only to XXXX and well controlled by current operational procedures. There is a separate container in the dishwashing area for broken glass and sharp lids.

Recommendation: None

28	Trash Removal	
a.	What personal protective equipment are employees required to use while disposing of trash and garbage?	

Comments: There is no formal policy that associates are required to wear protective gloves while disposing of trash and garbage.

Recommendation:

16-08-10 – Trash Handling Procedure: A formal policy/procedure should be developed to handle trash handling while using Personal Protective (*leather gloves*) that is strategically located for easy access. The use of PPE should be enforced by local Management and be part of the topics to be discussed during Shift Meetings.

29	Hot Oil and Grease Removal	
a.	What safety procedures / equipment are in place with regard to the safe removal of hot oil and grease from deep fryers?	

Comments: Hot oil and grease removal are an integral part of the existing operations. Some XXXX locations have an automatic system in place that does not require manual handling however XXXX have manual procedures in place. These procedures call for a metal cooking pot with an open top to be used and manually carried to a collection point. This collection point is usually located in an area that requires changes in elevation and the steps are not adequately maintained, creating a Slip & Fall Hazard.

This task needs to be reevaluated to remove/mitigate the existing exposures.

Recommendation:

16-08-11 – Hot Oil and Grease Removal Procedure: A formal policy/procedure should be developed to handle hot oil and grease from all the locations. Consideration should be given to performing Job Safety Analysis on this task and developing safe handling procedures which include PPE.

30	Sharp Objects Disposal	
a.	What procedures are in place for the safe disposal of sharp objects such as #10 lids?	

Comments: See Item #27.

Recommendation: None

31	Keg Storage	
a.	If the insured stores beer kegs, is there a maximum height requirement for the storage of such kegs?	
b.	What is it?	

Comments: Not Applicable

Recommendation: None

32	Anti-Slip Mats	
	a.	Are such mats used in the back of the house?
	b.	How often are they replaced and or cleaned?
	c.	Who is responsible for cleaning the mats?

Comments: For XXXX, there is no BOH use of anti-slip matting. For XXXX, anti-Slip mats are also not being used for the BOH but there is limited use in the dishwashing area. There are some locations that have a wet floor environment but that can be controlled by the re-evaluation of the cleaning procedures and repair of equipment that produce excessive floor moisture.

Freezers are a major concern due to the observations made during the surveys of excessive ice collection due to damaged doors. Some freezers had cardboard on the floor or anti slip matting that was not serviceable due to the extreme low temperatures.

Recommendation(s):

16-08-12 – Anti-Slip Matting Policy-Back of the House: A formal policy/procedure policy should be developed and implemented for each concept based on a needs requirement analysis includes, inspection, areas of use, maintenance and replacement once the mat is no longer serviceable.

33	Ice Machine	
	a.	What procedures are in place to ensure that excess ice does not gather on the floor near the ice machine?

Comments: The ice machines are usually located in an area of the location that does interfere with the normal traffic pattern. Due to the nature of the operation, this exposure is limited and well controlled by current operational procedures.

Recommendation(s): None

34	Other Personal Protective Equipment (PPE)	
	a.	Describe how the manager ensures compliance with rules concerning the use of oven mitts, dishwashing gloves, tongs, goggles, aprons, gauntlet sleeves, and other PPE.
	b.	Do associates get "written-up" for violating such rules?

Comments: PPE was not observed to be readily available and adequately displayed for XXXX but XXXX was observed to be adequate. Better housekeeping in the storage of PPE should be established as well as an inspection and replacement program.

Recommendation(s):

A recommendation for this exposure has already been submitted above. (See Rec# 16-08-08).

35	Step Stools / Ladders	
	a.	Is such equipment available to associates so that they do not stand on furniture and other equipment to reach heights?
	b.	What is the condition of such equipment?
	c.	Is equipment rated for commercial use?

Comments: There are ladders and step stools available to employees to reach heights; however, there is no formal policy for the use, inspection, maintenance and procurement of commercially rated Step Stools & Ladders. The ladders were not considered to be adequate because: 1- they are not commercially weight rated, 2- they do not have a large work platform and 3- they do not have an extended guard rail.

In several locations the ladders were found to be improperly maintained and steps were grease laden creating Slip & Fall Exposures to employees using the equipment.

Recommendation(s):

16-08-13 – Step Stools & Ladders: A formal policy should be put in place for the use, inspection, maintenance and procurement of commercially rated Step Stools & Ladders that include a large work platform and an extended guard rail.



36	Lifting / Strains & Sprains	
	a.	What training and instruction do associates receive in proper techniques for lifting heavy objects?
	b.	Are specific procedures in place for lifting objects that are greater than 25 pounds?
	c.	What is the capacity of the ice buckets?
	d.	What accountability is in place to enforce such rules?

Comments: Lifting / Strains & Sprains training is not provided during the initial training period of all associates. Based on the current loss experience and observations during the surveys, a re-evaluation of this exposure should be conducted. This re-evaluation should not only take into account the weight being lifted but other viable ergonomic variables.

Recommendation:

16-08-14 – Material Handling Policy: The current material handling policy should be re-evaluated and protocols implemented to reduce this exposure. The policy should take into consideration such factors as weight and bulkiness of the commodity being handled, storage areas, use of ladders, confined spaces and other ergonomic variables.

37	Dumpsters	
	a.	Are all dumpsters equipped with low entry access?

Comments: Not Applicable

Recommendation(s): None

38	Knife Storage	
	a.	How are knives stored when not in use?
	b.	What procedures are in place for cleaning knives?

Comments: During the survey it was noted that there was an inconsistent manner of the type of knife, number of knives and the care and storage of the knives. A standardized policy for knife use needs to be developed and implemented.

Recommendation(s):

16-08-15 – Knife Equipment Policy: A formal policy/procedure should be developed to ensure a standardized approach to the use, procurement, inspection, maintenance and replacement of Knives.

39	Rack Storage	
a.	What is the condition of racks used for storing?	
b.	What is the maximum height allowed?	
c.	How often are the racks checked?	

Comments: Food storage racks inside and outside the refrigeration units are overall in good condition however they were not adequately loaded with heavier items on the bottom and the lighter items on top. This condition creates Ergonomic Injury Exposures for employees using this shelving.

As an example, cardboard boxes laying on their sides with the lid flaps still on were observed being reached in quickly by staff and running out of the freezer due to the cold temperature. This creates a host of potential injuries that can be mitigated once the freezer inventory is stored/displayed correctly for ease of use during normal operating hours.

Recommendation(s):

16-08-16 – Rack Storage Policy: A formal policy/procedure for the use of storage racks throughout the entire BOH. Management should include this as part of their daily inspection protocol and take appropriate action once violations are identified.

40	First Aid Kit	
a.	Is a properly stocked first aid kit available?	
b.	Where is it?	

Comments: First Aid kits are available at all locations, however, they were not adequately stocked and maintained at several locations.

Recommendation(s):

16-08-17 – First Aid Kit Policy: A formal policy/procedure should be developed to ensure a standardized approach to the use, procurement, inspection, maintenance and replacement of the First Aid Kits.

E. Property

41	Exhaust System	
	a.	Standard Hood Protecting all Vapor Emitting Equipment?
	b.	U.L. Listed Filters (Baffles) at 45 Degrees with Grease Tray & Cup
	c.	Hood / Ductwork Professionally Cleaned as Required?
	d.	Filters Cleaned on a Weekly Basis by Store Staff?

Comments: All restaurant locations are equipped with hood protection over all vapors emitting equipment. The baffles are UL Listed and installed at a 45° with a grease tray and cup. The hoods are professionally cleaned as required by code.

Recommendation(s): None

42	Automatic Extinguishing System (AES)	
	a.	Is the Hood Fire Extinguishing Equipment U.L. 300 Complaint?
	b.	Are AES Discharge Nozzles Aimed to Protect All Equipment?
	b.	Is the AES Service Up to Date and Properly Tagged/Marked?
	c.	Manual Pull Activation Provided in the Path of Egress?
	d.	Are Employees Aware of its Position and How/When to Activate?
	e.	Are the Fusible Links Inspected by Store Management as part of their inspection routine?

Comments: All restaurant locations are equipped with UL 300 compliant fire extinguishing equipment as required. The installation has adequately aimed discharge nozzles and the system service is up to date and properly tagged.

Recommendation(s): None

43	Fire Extinguishers	
	a.	Are ABC Type Fire Extinguishers provided as need at strategic locations?
	b.	Are K-Rated Fire Extinguishers in Kitchen and Properly Mounted (within 30 feet)?
	c.	Are Staff trained on the use of Portable Fire Extinguishers?
	d.	Are all Portable Fire Extinguishers Serviced with Tag Up to Date?

Comments: All restaurant locations are equipped with UL listed ABC extinguishers adequately mounted in front and in back of the house as required by NFPA 10. Overall, the inspection tags were found to be up to date.

Recommendation(s): None

44	Other Exposures	
	a.	Are there any other Conditions/Exposures that may contribute to the Probability and or Severity of a Property Loss?

Comments: There were no general adverse conditions or exposures effecting the locations visited noted during these surveys.

Recommendation(s): None