Safety Program Policy and Procedures for

Company Name, DBA: Company

Note: Company will be referred to as “Company” throughout this document.

Contents

1. Safety Mission Statement 2
2. Driving/Employee Hiring and Screening 3
3. Driver/Employee Supervision and Training 6
4. Owned, Non-Owned, or Leased Vehicles 7
5. Accident Procedures and Investigations 8
6. Vehicle Maintenance and Inspection 9
7. Vehicle Use Policy 11
8. Safe Driving Policy (Includes Distracted Driving) 12
9. Driver Read Receipt 13

Appendix 1: New Driver Checklist (With Record Retention Information)

Appendix 2: Educational and Technical Assistance-Accident Countermeasures

Appendix 3: DOT Controlled Substances and Alcohol Policy

1. Safety Mission Statement

The management of Company is committed to a proactive approach to cultivate and maintain a safety culture that impacts personal, on-the-job, and public safety, which will reduce crashes, injuries, or fatalities.

Owner/NameABC is the primary safety officer for Company, who will answer safety policy or procedures questions, and who will be responsible for calling in all claims regarding safety occurrences.

Company believes that:

1. The safety and well-being of all company employees is important.
2. Safety takes precedence over expediency.
3. Accident prevention is the responsibility of everyone employed by Company.
4. Safety information is to be effectively communicated to all employees at time of hire, with updates and reminders communicated regularly. Initial and recurrent training is provided as needed to assist employees with their safety sensitive functions as applicable to their roles in the company.
5. All vehicles, equipment, and personnel must be in compliance with company, state, local, and federal safety rules, regulations, and statutes. Guidelines used are Federal Motor Carrier Safety Regulations, Texas Administrative Codes, Texas Department of Motor Vehicle rules, Texas Transportation Codes, OSHA, EPA, TCEQ, and local laws.
6. Everyone is held accountable for compliance with safety requirements.
7. Managers and supervisors have a greater responsibility for monitoring adherence to safety requirements and are proactive in reviewing changes to laws for compliance. Findings of noncompliance are priority issues that are dealt with quickly and resolved.

For these reasons, Company has developed a safety program that requires full cooperation of both employees and managers. Employees are encouraged to read these policies and procedures carefully and ask questions for full understanding.

Warning: Failure to comply with these safety policies and procedures could subject employees and/or managers to disciplinary action, which may include removal from safety sensitive functions, suspension, or termination.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

NameABC, President Date

1. Driver/Employee Hiring and Screening

For safety reasons, all employees will be screened and thoroughly evaluated to ensure they have the proper qualifications to fulfill their functions in safety sensitive roles and responsibilities.

DOT rules mandate driver qualification hiring procedures, as well as annual checks, to ensure safety checks are in place. The New Driver Checklist (With Record Retention Information) in Appendix 1 will be utilized to ensure all required qualification steps are followed.

(Note: For re-hiring situations, all former drivers will be re-qualified per all criteria below.)

1. For New Hire Driver or Re-hire Driver, driver will be qualified per all criteria below:
2. Follow New Driver Checklist to ensure no steps are missed.
3. Require driver to sign releases to release/authorize for MVR checks, background and experience inquiries.
4. Require driver to completely fill out an application with DOT-required fields with all required information. (Note: Falsification of employment records or any other FMCSA/DOT records is prohibited.)
5. Review application for gaps in employment, poor safety history, or disqualification of commercial or regular driver license.
6. Perform a safety performance history check for previous 3 years of employment with DOT-regulated employers within 30 days of hire. Document a good faith effort to obtain information with several attempts of contact to include phone calls, emails, fax, or mail.
7. Perform National Clearinghouse query (full-preemployment)
8. Motor Carrier Bureau database check for positive driver or refusal to test.
9. Copy CDL, medical card, and medical waivers (as applicable). All information will be scanned, front (and back-if applicable), and reviewed for legible photocopy.
10. Review CDL, medical card, and medical waivers for valid and current dates, noting CDL class, endorsements, restrictions, and expiration due date to monitor and track.
11. Run MVR (3-year record of moving violations and accidents) with State Drivers License office or third-party service, and document in Driver Qualification file, within 30 days of hire. Medical information is currently required to be in on MVR, so review for accuracy and compare to copied medical card.
12. If no medical information is available, require driver to obtain medical examination with nationally-registered medical examiner, certify medical status with Driver License, and submit new medical card to Driver License by fax, email, or walking in to Driver License. Note: It is a good idea to require drivers to pay $11 and walk in new medical card to Driver License, if it is close to the expiration date, or if they need to change their medical status certification. (Email: [cdlmedcert@dps.texas.gov](mailto:cdlmedcert@dps.texas.gov); Fax: 512-424-2002)
13. Review the medical information is input on the MVR by monitoring the Department of Public Safety Eligibility website: <https://txapps.texas.gov/txapp/txdps/dleligibility/login.do>
14. Review the National Register of Medical Examiners and print inquiry return, or make a note that it was checked at the following website: <https://www.fmcsa.dot.gov/regulations/medical/national-registry-certified-medical-examiners>
15. Review MVR return for valid and current CDL, correct class, medical card on file with DPS, moving violation record, accidents, driver’s age and current address. Unacceptable and marginal driving records will result in a no-hire decision for the following criteria:
    1. Unacceptable Driving Record:

A driver with major violations within the last three years, including:

1. Violating the open container law (driver or passenger)

ii. Reckless driving

iii. Failure to yield to emergency vehicles

iv. Three or more moving violations within the last three years (including at fault accidents whether cited with a violation or not)

v. An out-of-state license more than 60 days past the request to acquire a Texas CDL.

vi. Vehicular homicide or other felony

vii. Passing a school bus

viii. Leaving the scene of an accident

ix. Driving while license is suspended, revoked, or canceled

x. Driving under the influence of alcohol or drugs

xi. Less than two years’ driving experience

* 1. Marginal Driving Record:

1. A driver who has one or more serious violations in the past three years, such as:
   * 1. Excessive speeding (15 mph or more over the speed limit)
     2. Careless driving, creating an accident
     3. Driving with two moving violations within the past three years

ii. A drivers whose driving record reflects possible poor driving habits, such

as:

1. Several not-at-fault accidents
2. Several minor traffic infractions
3. License at one time suspended for minor infractions
4. Administer Road Test, and document in the Driver Qualification file.
5. Verify hours of service for previous 7 days, verify hours if driver has secondary employment or is a multiple employer driver, or furnished driver.
6. Send driver for pre-employment controlled substances test, and verify negative results before driver is allowed to perform safety sensitive functions.
7. Enroll driver in random alcohol and controlled substances testing program.
8. For Current Drivers:
9. Run an annual MVR with State Drivers Office or third-party service (3-year record of moving violation and accidents), and document in the driver qualification file.
10. Review of MVR at least annually for valid and current CDL, correct class, restrictions, endorsements, medical certification and card on file with DPS, moving violation record, accidents, driver’s age and current address. Unacceptable and marginal driving records will result in negative safety review for driver, with termination of safety sensitive functions for unacceptable driving records, and/or revocation of driving responsibility and privilege for marginal driving records.
11. Require drivers to provide certification of list of moving violations convictions on annual basis.
12. Review annual certification of violations, compare to annual MVR, and place note of review in driver qualification file of driver’s safety status. (If unacceptable, document termination or suspension of driver.)
13. Run annual query in Clearinghouse. Review.
14. Track due dates on CDL, medical examination, query, annual MVR, annual list/certification of violations, and annual note of driving record review. Monitor monthly, and communicate reminders to drivers and safety personnel to meet deadlines for compliance.
15. Designated Employer Representatives (Name) communicates regularly with Alcohol and Controlled Substances Third Party Administrator/Consortium to add new drivers and delete terminated drivers from DOT random testing pool, and to make sure all selected drivers are tested during the selection period.
16. Designated Employer Representatives (Name) notifies drivers of selections for random alcohol or controlled substances tests, ensures drivers proceed immediately to clinic for required testing, and follows through to verify results and to file required documents, according to record retention requirements.
17. Safety managers and supervisors immediately remove drivers who refuse to test, or test positive, on DOT-required tests.
18. Safety managers and supervisors oversee reporting of positive driver or driver who refuses to test, to Motor Carrier Bureau or when required, National Clearinghouse databases. Driver is informed of return to duty process, and requirement to see Substance Abuse Professional, and provided list of area Substance Abuse Professionals, according to Part 40 procedures.
19. Safety managers and supervisors place semi-annual and annual consortium and laboratory reports in Alcohol and Controlled Substances file, according to record retention requirements.
20. Trained safety managers and supervisors will refer drivers for reasonable suspicion alcohol or controlled substances testing, based on observable behaviors or odors. They provide the driver with transportation for this particular test, and follow through with results, and further monitoring or action, as applicable.
21. Require drivers to turn in time card or log books (electronic records will be utilized, with paper records as back up for electronic failures) and trip sheets such as dump tickets and fuel receipts.
22. Monitor records related to hours of service for missing, incomplete, inaccurate, and hours of service compliance. Provides immediate feedback and disciplinary actions for drivers who do not comply with hours of service rules.
23. Require drivers to turn in Driver Vehicle Inspection reports (electronic records will be utilized, with paper records as back up for electronic failures).
24. Monitor Driver Vehicle Inspection Reports for missing, incomplete, inaccurate, certification of repairs, and file retention compliance.
25. Transfers Driver Vehicle Inspection Reports repairs to applicable maintenance records to record all repairs and maintenance performed.
26. Driver/Employer Supervision and Training

Company is committed to safe operation of motor vehicles for our business activities on a continuing basis. Therefore, we will utilize the following:

1. Employee review and acknowledgement of our Accident Procedures and Investigations Policy in Section V.
2. Employee review and acknowledgement of our Vehicle Use Policy in Section VII.
3. Employee review and acknowledgement of our Safe Driving Policy, which includes Distracted Driving, in Section VIII.
4. Employee review and acknowledgement of our DOT Controlled Substances and Alcohol and Testing Policy in Appendix 3.
5. Periodic documented safety training meetings (at least 2 per year).
6. Revocation of driving responsibility and privilege for anyone with an unacceptable MVR.
7. Mandatory defensive driving training in the event of an at-fault or preventable crash.
8. Safety Managers and supervisors will be trained on Reasonable Suspicion testing, and will observe drivers and employees conducting safety sensitive functions, and refer for testing, as needed.
9. Safety Managers and supervisors will observe and supervise drivers periodically while they are conducting safety sensitive functions. Safe operation of vehicles and equipment and safety practices will be observed, and drivers will receive immediate feedback and/or disciplinary action for infractions of safety or noncompliance. Written documentation of feedback or of disciplinary action will be performed, for any safety infraction or unsafe driving observed or discovered.
10. Employee training upon hire, and refresher training, as applicable, will be provided for qualification requirements such as physical health conditions that are disqualifying, license requirements, driver wellness and healthy practices, and other compliance issues and policies/procedures.
11. Employee training upon hire, and refresher training, as applicable, will be provided for hours of service compliance and policies/procedures. Drivers will be informed of exceptions to regulations, supporting documents and business records required to be submitted and retained for verification of hours of service, time card requirements and terms of exemption, and when log books or electronic logging devices will be applicable.
12. Employee training upon hire, and refresher training, as applicable, will be provided for pre- and post-trip requirements, vehicle maintenance responsibilities, and whistleblower protection policies.
13. Employee training, as applicable, will be provided on accident countermeasures, defensive driving, and policies/procedures for accident situations.
14. Employee training, upon hire, and refresher training, as applicable on CSA scores and how driver and vehicle violations, affect the safety posture of the company.
15. Training, whether individual or group, is documents and maintained in safety records.

Note: NAME ABC is responsible for overall supervision of company drivers.

1. Owned, Non-Owned, or Leased Vehicles

Employees driving vehicles on company business poses certain risks for the company and others. Therefore, Company requires the following from employees:

1. Provide a copy of your valid driver license.
2. Be included on our insurance driver list.
3. Authorize company to perform regular MVR check on your driving record.
4. Participate in company driver training and safety meetings.
5. Do not allow non-company employees to ride in company vehicles, without authorization from supervisors or managers.
6. Only operate vehicles that are road-ready, inspected, and within safety standards and regulations.
7. Perform daily vehicle inspection reports and the annual periodic DOT inspection, on all DOT-regulated vehicles, including leased vehicles. Communicate vehicle defects both orally and on daily reports, to mechanics and safety supervisors responsible for repairs.
8. Vehicle registration, permits, taxes, operating authority will be tracked for both owned and leased vehicles, to ensure all vehicles are operated legally, according to all local, state, and federal laws.
9. Maintenance files will be maintained on all regulated commercial vehicles, whether owned or leased, that are controlled for 30 consecutive days or more. Lease maintenance agreements will require that Company be provided all records of repairs, inspections, and preventative or routine maintenance, and that all maintenance will be performed promptly and thoroughly, per Appendix G of Part 396 in the FMCSRs.
10. For security reasons, vehicles will be parked on company premises or at safe locations. Access to vehicles will be restricted to licensed drivers who are assigned to operate those vehicles. During accidents or emergency stops, all care will be given to park vehicles in safe locations.
11. Accident Procedures and Investigations

Company believes that it is important to be prepared in the event of an accident. Drivers should reference Appendix 2 to review information on preventable accidents and accident countermeasures in the FMCSA Educational and Technical Assistance Package-Section 4.

If drivers are involved in accidents, the primary goal is to learn the circumstances surrounding the incident to help prevent a similar accident from occurring again. The following are procedural guidelines in the event of an accident:

1. Stop immediately and determine if there is damage to any vehicles, injuries, or spills. If possible, park in a safe location, and avoid obstructing traffic.
2. Activate hazard flashers, and place emergency triangles or flares on the road, at prescribed distances and locations according to FMCSRs.
3. Contact emergency responders immediately, if applicable. Provide emergency contacts as detailed information as possible, giving location, mile marker, company name, driver name, and details of crash. Only provide factual details, and do not give opinions or speculations of cause.
4. Call the police.
5. Call your Company safety supervisor.
6. Document details of the accident as soon as practicable.
7. Company supervisor will respond to the scene, if possible.
8. Drivers and company officials are advised to cooperate with officers’ crash or accident investigation, but to avoid admitted fault or providing additional information not requested. Discretion should be used when talking to other drivers, as this information may not be accurate and could potentially be used in a lawsuit against the company.
9. If possible, pictures should be taken of vehicles involved in the accident, to include license plates, insurance documents, vehicle damage, and positions.
10. Ensure all pertinent information is gathered, such as police report, contact information for other drivers or insurance, vehicles involved, etc.
11. If officer takes any documents on board, such as log books, dump tickets, driver vehicle inspection reports, driver or Company supervisor should inventory what documents are released, to whom, and request how to obtain copies, or retrieve them later.
12. Note inventory of vehicle belongings and safety records or equipment onboard, if the event of a towaway. The following documents should be retained indefinitely should an auditor, lawyer, police officer, or other examiner request them:
13. Driver logs, time cards, or electronic logging devices, up to 6 months prior to the accident.
14. Payroll or other employment records.
15. Dispatch records.
16. Load tickets, scale receipts, invoices, sales tickets, fuel receipts, or other trip documents onboard the vehicle.
17. Safety data captured in onboard devices or cameras.
18. Cell phone, fueling records, credit card statements, disciplinary records, training records, etc.
19. Photos from the accident scene.
20. Driver vehicle inspection reports, up to 3 months prior to the accident.
21. Vehicle Maintenance Records, up to a year prior to the accident.
22. After driver completes requirements at the scene of an accident, driver (who is operating a CDL-required vehicle) is required to undergo DOT post-accident alcohol and controlled substances testing for fatalities. Driver must proceed as soon as possible to a clinic for testing. In the case of an injury or towaway crash where Company CDL driver is given a citation for a moving violation, DOT post-accident alcohol and controlled substances tests are required.
23. While details are fresh on the driver’s mind, driver should fill out an incident report and provide requested information to Company safety supervisors.
24. After an accident, drivers will be required to attend refresher training on accident countermeasures and defensive driving techniques, as applicable.
25. Disciplinary action will be required in accidents where a driver was at fault, failed to take preventable actions, or did not follow safety requirements. Disciplinary action includes immediate feedback, refresher training, written disciplinary records, suspension, or termination.

Note: NAMEABC and safety managers will review the details of the accident in an internal investigation, to determine preventability and root case.

1. Vehicle Maintenance and Inspection

Company believes that there are many benefits to a well-maintained fleet of vehicles. Some of the benefits are:

* Enhanced business reputation by keeping vehicles clean and presentable.
* Cost savings and longevity of fleet by performing preventative maintenance at manufacturer-recommended intervals.
* Improved employee morale and retention from driving clean and reliable vehicles.
* Reduced potential for accidents due to equipment issues.

1. Company requires the following procedures to keep a well-maintained fleet:
2. Daily walk around and visual inspection by each driver prior to start of work.
3. Mid-trip inspections, as needed, to check lamps, turn signals, tires, or possible developing maintenance issues.
4. Post-trip inspection, to be documented electronically (or back up on paper, if electronic failure) for regulated commercial vehicles, which will be retained for 3 months. These will be routed so that all pertinent personnel may be notified. After repairs are evaluated, then certified as repaired, the DVIR will be routed back to reporting driver and/or next driver, so that at the next pre-trip inspection, the following driver may verify that the defects were corrected, and that the vehicle is “road ready” for the next trip.
5. Annual documentation of periodic inspection, required per 396.17, for regulated commercial vehicles. The receipt, will be copied, and the original will be placed in the binder that stays onboard the vehicle, and the copy will be scanned into the electronic maintenance office file.
6. Immediate notification to supervisor or mechanic of any safety issue or repair needed. Company will not allow vehicles to operate with known out-of-service defects and/or equipment defects that can lead to accidents or out-of-service issues. Drivers, mechanics, and safety supervisors are all responsible to ensure that all vehicles operate safely and that maintenance issues are addressed promptly.
7. Maintenance of a documented service and repair history for each fleet vehicle, which includes the following required information:
   1. An identification of the vehicle including Unit #, Make, Year,   
      VIN, and Tire Size.
   2. Current Vehicle Registration.
   3. Current Vehicle Annual DOT periodic inspection, and previous Annual DOT inspection.
   4. Record of all repairs, including repairs without parts receipts and repairs performed on the road by drivers. The document will include the date, the nature of the repair, the person performing the repair, and details of the repair to include any parts replaced. Simple repairs requiring no parts are still required to be documented by whoever makes the repairs, even drivers. (Examples: adjustments to brakes, change tire, change lamp). This record of repairs will be retained for the vehicle, as long as it is in service, and for 6 months afterwards. In the event of a crash, this record will be retained longer, pending investigations or audits on the crash.
   5. Maintain a documented service history for each fleet vehicle, which especially includes a preventative maintenance service schedule with due dates or due odometer thresholds, based on manufacturer recommendations for routine periodic maintenance. Due dates will be recorded and tracked to keep the service schedule.
   6. All regulated commercial vehicles will have an up-to-date organized notebook to be kept onboard the vehicle, in the event of a roadside inspection. Everyone is responsible for keeping documents up-to-date. Drivers should review the notebook documents each month for expiration dates and report any findings to safety staff. Safety staff will track due dates and provide reminders to ensure registration and inspections do not expire.
   7. The following documents will be kept onboard the vehicle:
8. Vehicle registration.
9. TXDMV Cab Card with VIN# highlighted for each commercial vehicle controlled for 30 consecutive days.
10. Proof of periodic inspection.
11. Permits, if applicable.
12. Proof of insurance.
    1. Annually, the vehicle maintenance files kept in the office, and the vehicle notebook kept onboard the regulated vehicles, will be reviewed and evaluated for accuracy, completeness, and effectiveness.
13. Vehicle Use Policy

Company believes that vehicles provided to drivers are to be tools related to performance of specific jobs and never considered to be part of compensation. In the event of a change in duty not requiring driving, driver will cease to have the privilege of using the company vehicle. The following policies are adopted for the privilege of using the company vehicle:

A. Vehicle use is only for company business and not allowed for personal use, unless specifically authorized by company officials.

B. If personal use of the vehicle is authorized, only the authorized employee will be allowed to drive it.

C. Drivers of company vehicles are expected to exercise reasonable care in the operation of the vehicle, and practice sound defensive driving techniques.

D. Passengers that are not authorized will not be allowed to ride in company vehicles.

E. Alcoholic or drugs will not be allowed to be onboard company vehicles, and drivers may not be under the influence of alcohol or drugs.

F. Drivers should notify safety supervisors of medical conditions, license issues, or prescription drug use that could hamper the safe operation of company vehicles.

G. Any violation of Company vehicle use policies will result in disciplinary action, up to termination of employment.

H. Drivers are expected to obey all laws in the operation of motor vehicles, both for personal driving and professional driving. This includes laws regarding carrying personal liability insurance, as this can be a reason for suspension of driver license. Should there be a violation of a law, either in personal driving or in driving for the company, drivers are expected to make appearances in court, pay fines, and take responsibility to ensure that their driving record is clean. It is not the responsibility of the company to pay or reimburse drivers for driving record issues.

I. Drivers are required to wear seat belts at all time, and require authorized passengers to wear seat belts.

J. Drivers must stop at scale inspection facilities or as directed by law enforcement, and cooperate respectfully with officers. Courtesy and professionalism is required.

K. Drivers will not drive company vehicles if a safety issue is discovered during a vehicle inspection, until the defect is repaired, or clearance is given to operate safely.

L. In the event of an accident or breakdown, all care will be given to ensure the vehicle is attended to, and parked or towed to a safe location.

M. As a condition of employment, drivers may be required to attend safe driving classes or meetings, or take a defensive driving course.

1. Safe Driving Policy (Includes Distracted Driving)

Drivers are expected to drive safely and defensively to avoid accidents or to prevent an accident from occurring. In the event that an accident is non-preventable, drivers should still try to take evasive actions to save lives if possible. Consequences for violating the safe driving policy are disciplinary action, including immediate feedback, verbal or written warnings, refresher training, suspension, or termination. The following are guidelines and policies for safe driving:

* Drivers should wear seatbelt and require passengers to wear seatbelts.
* Drivers should yield the right-of-way to other drivers who may be in the wrong, to prevent an accident.
* Drivers should slow down in adverse driving conditions.
* Drivers should obey the speed limit in normal driving conditions.
* Drivers should maintain visual and auditory alertness, by keeping eyes on the roadway ahead for potential hazards, as well as listening for sirens, horns, or other indicators of hazards ahead.
* Drivers should keep both hands on the steering wheel.
* Drivers should take care to avoid mental or emotional distractions, while driving. If drivers are upset or angry, they should not drive.
* Drivers should not operate while fatigued or ill.
* Commercial driving rules prohibit texting or operating a hand-held mobile telephone. “Texting” is defined as the review of, or preparation and transmission of, typed messages through any such device. “Use of a hand-held mobile telephone” means: 1. Using at least one hand to hold a mobile telephone to conduct voice communication. 2. Dialing or answering a mobile telephone by pressing more than a single button. Note: 392.80 allows for an exception to texting or using a hand-held mobile telephone. It is allowed for necessary communication to law enforcement officials or emergency personnel.
* Drivers should avoid distractions such as talking to passenger, talking on a cell phone, texting, eating, drinking, using an electronic device or GPS, reading emails, watching a video, changing a radio station or CD, etc. Therefore, it is best to program GPS or refer to route instructions, before driving. Drivers should pull off the traveled portion of the road, if they need to make phone calls, eat, or refer to route instructions.

1. Driver Signature Page

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Driver Printed Name

I certify that I have received, read, and understand the safety policies and procedures for Company. I have had the opportunity to ask questions so that I understand them. I am aware that failure to abide by these policies will result in disciplinary action, up to and including termination of my employment with Company.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_

Driver Signature Date

Appendix 1: New Driver Checklist (With Record Retention Information)

Appendix 2: Educational and Technical Assistance-Accident Countermeasures

Appendix 3: DOT Controlled Substances and Alcohol Policy