Section 3

SAFETY & HEALTH LOSS PREVENTION PLAN

Introduction

An established principle of risk management is to take steps to prevent loss. This is a key element of the oversight role delegated to the Risk Management Division by the Board of County Commissioners. However, Risk Management staff are not exposed to the daily operations in departments so much of the responsibility for hazard recognition and control resides with the managers, supervisors, and employees in the department.

Just as there are requirements with regard to insurance coverage and claims management, the Oregon Safe Employment Act requires self-insured employers to have a plan in place to provide assistance with preventing occupational safety and health losses.   The criteria include regulatory compliance and loss prevention by seeking out and correcting hazards. Ultimately the responsibility for implementation still rests with the Departments but resources and assistance are available from the Risk Management Division.

The goal is that every employee has the benefit of a systematic effort to provide a safe, secure, and healthful workplace. Ideally, every location has a written plan. It is not that information in a binder makes us safe; rather that systematic evaluation and documentation results in better understanding of hazards and development of safe work practices. A well written program will also be the basis for training.

How does this happen and who is going to do it?

Departments may choose to write programs themselves, borrow from professional peers, use consultants, or request assistance through Human Resources (HR)/ Risk Management. If you are confident with existing work practices you can start with writing those down. Experience has shown that it is not possible to write a single document or set of procedures to address the wide range of hazards from the routine and non-routine activities of the County. Where feasible, countywide programs have been developed or offered as examples and this work will continue. Current material can be found in Sections 8 and 9 of the Risk Management Manual.

Facilities Management can be a valuable resource for addressing physical hazards. They have the advantage of years of experience in a wide range of settings. Very often a problem can be solved by submitting a Facilities Management Service Request.

Risk can assist with professional safety and industrial hygiene services, whether directly supplied or by referral to outside entities. The process for requesting and prioritizing assistance is discussed later in this Section.

Getting safety done is like any other function. The tasks need to be assigned and supported by management, whether it is one key person who handles it all or the duties are disbursed among many.   For example, one person may be assigned the data gathering and another employee training. The key is that the person assigned the task have the resources and authority necessary for implementation.

Safety and Health Loss Prevention Plan

ORS 437-001-1060 states that effective loss prevention by self-insured employers must address at least the following eleven elements.

1) Management commitment
2) An accountability system
3) Training
4) Hazard assessment and control
5) Investigating and corrective action for occupational injuries and illnesses
6) Personal protective equipment
7) On-site industrial hygiene and safety evaluation
8) Ergonomic assessment
9) Employee involvement
10) Annual evaluation
11) Records that document the assistance provided

The following is a discussion of each of the elements. It includes examples of activities or programs that have proven effective in promoting workplace safety and health.   The concepts apply to all environments, without exception. However, how each is implemented can depend on the organization and culture of the department.   Risk Management is your partner in this process.

1.   Management commitment to health and safety

Typically this is initiated through a clearly stated safety and health policy. Ideally it will be written, communicated and understood through all levels of the organization. Safety is recognized as a management function requiring the same executive direction and control as operation and cost.

It is sustained by including safety and health in the setting of goals and objectives for the department. All tiers of management and line supervision understand the goals and measures for achieving them.

Management is actively committed to safety and health, leading by example, supporting time and money spent on safety concerns.   The workforce can explain, and fully embraces injury and illness prevention processes.

Where to find more information:

The Board of County Commissioners and County Administrator statements of commitment can be found in the Introduction to the Risk Management Manual.

Each department should have a similar statement of commitment from their director available to employees.

Section 1 of the Risk Management Manual, Organization and Responsibilities, speaks to management and supervisory roles.

2.   An accountability system for employer and employees

Successful accountability systems have appropriate consequences for both positive and negative performance and are applied consistently and evenhandedly to all.

Safety and health goals are part of performance evaluations at all tiers. Employees understand the goals and measures, and their role in achieving them.

Management follows the safety rules for their facilities and is an active force for change in the behavior of others.

Where to find more information:

The County's "Safety Incentive/Recognition Program" is based on providing reinforcement for positive behaviors and actions. Information on the program can be found in Section 8 of the Risk Management Manual.

The principles of progressive discipline are followed when addressing negative performance. Safety expectations are discussed during new employee orientation. These are among the topics discussed in the "Clackamas County Employee Handbook" that all employees receive at hire.

3.   Training practices and follow-up

At a minimum, employees receive training at the time of initial assignment, when processes or hazards change, and as needed to maintain proficiency. Observations are made to ensure that the training was understood.

Supervisors understand and reinforce the training in safe work procedures and hazard protection. Safety training is viewed as an essential part of professional development.

Managers are trained in and understand the principles of injury and illness prevention as well as their role in it.

HR/Risk Management provides new employee orientation to cover countywide topics. An additional orientation session is held in the employee's department to provide site and task specific information.

Where to find more information:

New employee and department orientation is discussed in Section 6 of the Risk Management Manual. Corrective action training in place for driving related preventable incidents (Alert Driving or other approved training).

Information on specific safety programs and policies can be found in Sections 8 and 9 of the Risk Management Manual.

4.   A system of hazard assessment and control

Prompt corrective action is taken when hazards are identified with a priority given to engineering controls. Safe work procedures, administrative controls, and personal protective equipment are used where engineering controls have not eliminated the hazard.

Supervisors include hazard recognition and correction as part of their regular observations in the work area. Prompt corrective action is taken.

Expert survey and technical assistance is used to respond to special needs, incidents, new equipment and processes.

The safety committee inspection team conducts effective routine hazard surveys. Team members have been trained in hazard recognition and submit recommendations for correction with their reports.

Where to find more information:

Safety Committees, including inspections, are discussed in Section 8 of the Risk Management Manual. Overviews of some of the most common regulatory requirements are in that section as well. Also addressed through the Safety Incentive/Recognition Program for observing and correcting unsafe issues. Issues regarding building specific safety problems are corrected and tracked via MPulse, which is Facilities Management work order tracking tool.

The Assessment Tool at the end of this section can be used by staff in the department to look at the hazards in a workplace and to gauge the level of compliance. The safety committee could also use it as part of their inspections and program review. Risk Management staff will be using the same format when working with departments.

5.   A system for investigating all recordable occupational injuries and illnesses that includes corrective action and written findings

All loss-producing incidents and near misses are investigated to identify means of prevention. The emphasis is on correction and prevention, not fault finding.

Injuries and illnesses are analyzed for trends and causes, and the information is shared throughout the organization.

Notifications are given in a timely fashion to OR-OSHA, Risk Management, and family members.

Where to find more information:

Accident Reporting and Investigation is discussed in Section 4 of the Risk Management Manual.

6.   **A system for evaluating, obtaining, maintaining personal protective equipment (PPE)**

All departments and locations will have completed the PPE assessment required by Oregon OSHA rule.

The required PPE is provided by the employer to the employees in a range of styles and sizes to accommodate the variability between individuals.

Users of PPE will have been trained in the correct use, maintenance, and limitations of the equipment.

Where to find more information:

Information on developing and implementing a PPE program is included in Section 8 of the Risk Management Manual. Bloodborne Pathogen Exposure Control, which includes the use of PPE is discussed in Section 9

7.   **On-site routine industrial hygiene and safety evaluation to detect physical and chemical hazards of the workplace, and the implementation of engineering or administrative controls**

Subject matter expertise and specialized resources are available to the department to provide survey and technical assistance to respond to special needs, incidents, new equipment and processes.

Where to find more information:

The county has working relationships with expert consultants in various fields.   Requests are typically handled through the Risk Manager. How to request assistance is addressed at the end of this section.

8.   **Evaluations of workplace design, layout and operation, and assistance with job site modifications utilizing an ergonomic approach**

Safety is included as a consideration in the planning stages of projects rather than relegated to the end when change is costly or no longer feasible.

Ergonomics is a consideration in facilities design and when selecting furniture and equipment.

HR/Risk Management provides assistance with training, basic site evaluation and modifications, and/or to recommend outside resources.

Support is given to stretching and work readiness as part of an overall fitness program.

Organizational culture supports asking for assistance when making manual lifts and utilizing material handling equipment where available.

Where to find more information:

Ergonomic services are provided by Risk Management staff and outside experts in more complex situations. Requests for service are typically made via email to Risk Management. There is more information on the ergonomic intranet site that can be found under Departments/ Risk Management.

9.   Employee involvement in the health and safety effort

Departments will have a safety committee that includes both labor and management that is active and effective.

All personnel have ownership and active roles in safety and health. Employers at all levels of the organization feel that they can have a positive impact and that their input is valued.

Safety and health responsibilities are assigned. All personnel understand what performance is expected of them. The necessary authority and resources are available to meet the responsibilities for safety and health.

Employees are a part of the hazard control system. They are trained to recognize hazards and have a role in developing solutions. They self-correct where they can and access the hazard reporting system when they cannot.

Where to find more information:

The Risk Management Manual covers Organization and Responsibility in Section 2 and Safety Committees in Section 8.

10.   An annual evaluation of the employer's loss prevention activities based on the location's current needs

A comprehensive review is conducted at least annually to assess the program and set new goals as needed.

Risk Management Division provides OSHA Recordable data by department and establishment to improve the department's ability to evaluate their performance.

Risk Management does an internal review of activities and incident trends.

Where to find more information:

The current Risk Management Report is on both the County Intranet and Internet sites. The internal reviews have been provided to Oregon OSHA compliance staff as part of the inspection process.

11.   The group shall maintain records which document the assistance provided to each member of the group

Risk Management is committed to presenting information in a manner that is clear and effective for the end users.

Data collection systems are used to prioritize and answer inquiries about notification, timeliness of service, and value added to departments.

Where to find more information:

Reports from site visits are provided to the client department. They may consist of printed and illustrated reports or handwritten forms provided by and to the client. Feed back is encouraged on whether the information was useful and how to improve the service.

Requesting Loss Prevention Assistance

Self-insured employers are required to make available to each of its workplaces or locations occupational safety and health loss prevention assistance and to inform its managers and workplace locations of the availability and the process for requesting loss prevention assistance.

 ➢ Requests for assistance in any of the areas outlined above can be made by anyone, via email, directly to the Risk Manager or Safety Analysts.

 ➢ Employees should copy their supervisor and safety committee representative at the same time they make the request to Risk.

 ➢ A long range goal is to create a method where reports of workplace hazards or safety and health questions can be submitted via the Clackamas County Intranet.

It is anticipated that there may be more requests than existing resources can immediately respond to. For this reason there also needs to be a system of prioritizing requests.

 ➢ All requests will be acknowledged no later than 2 working days after they have been received. If resources are not available to immediately respond the location making the request will be advised of other options.

 ➢ Any request from locations regarding imminent danger* will be responded to as soon as possible with loss prevention services.

 ➢ Requests regarding alleged hazards other than imminent danger shall be responded to with loss prevention services as soon as practicable, but not longer than 30 days following the date of the request.

➢ Requests for preventive hazard surveys, coaching of safety committees, and review of written documents will be responded to after alleged hazards have been addressed and as resources permit.

* Oregon OSHA defines imminent danger as a condition, practice or act which exists in any place of employment and could reasonably be expected to cause death or serious physical harm immediately (437-001-0015).

Tools

Instructions

This evaluation process is intended to help gauge the current level of compliance with Oregon OSHA standards and county policy. The subject areas are broad and the bulletin items are intended as aids to recognizing some of the components parts of a successful program. It allows for rating to assist departments in prioritize activities. It can also give a numeric score that can be used to track progress over time.

The **Workplace Program Assessment** contains programs that should be in place in nearly every workplace. Although many locations will say that Hazard Communication does not apply, it is likely that they do have toner and related copier supplies. Similarly, many won't think they have anyone using personal protective equipment (PPE) but if they have a bloodborne pathogens (BBP) trained responder in their group they do. Departments with multiple locations may want to complete the assessment for each location or operation.

Evaluate each element under the headings by looking at written documentation, observing the workplace, and talking with a variety of employees. The top score is reserved for those situations where the written program is current and consistently followed by the employees. Verification can come from observation or interviewing employees.

The **Special Hazards** section is a list of hazards more commonly associated with the industrial setting than the office environment. Very few locations will need to have every program on the list. However, it the hazard is present in the workplace the program needs to be in place.

The **Workplace Action Plan** is offered as a tool to turn the information from the assessment into action. Another option is to use an action planning method already in use in the work group for non-safety issues. The important thing is to act on the information from the assessment. Identify specific tasks that need to be done to achieve the desired outcomes. Be specific in terms of who will be doing what. Set reasonable timelines for completion. Include progress reports when the timeline is long or the task has multiple stages.

Other Applications

These tools can be used to monitor change over time by completing them periodically and comparing the scores. By giving them to a number of different employees you could gauge the perception of safety in the work group. The Safety Committee could use them as part of the quarterly inspection process or program reviews.

Workplace Program Assessment

Evaluate each element under the headings by looking at written documentation, observing the workplace, and talking with a variety of employees.

Score them:

    3   for each element that is in place, current, and verifiable

    2   for elements where implementation is partial or updating is needed

    1   for elements that still need to be implemented

If it does not apply write NA next to that element. However, remember that there will be relatively few locations that do not need to have these basic programs.

Emergency Plan

_____ 1st aid kit stocked

_____ Trained staff available, identified

_____ Escape routes posted

_____ Exits clearly identified

_____ Fire extinguishers accessible

_____ Drilled within past 12 months

_____ Threat/Violence awareness

General

_____ Local work area orientation

_____ Safety training documented

_____ Food areas clean

_____ Aisles and walkways clear

_____ Storage areas orderly

_____ 18" sprinkler clearance

Ergonomics

_____ Workstations evaluated &
     properly equipped

_____ Employee concerns addressed

_____ Material handling aids available
     (hand trucks, carts, hoists)

_____ Factored into workstation design
     and equipment purchasing

Safety Committee

_____ Meeting regularly

_____ Minutes available

_____ Reviewing incident reports

_____ Quarterly inspections done

_____ Members trained in duties

Vehicles/Drivers

_____ Trained in Defensive Driving

_____ Conduct pre-trip inspections

_____ Insurance (see County driving
     policy, EPP # 52)

Personal Protective Equipment (PPE)

_____ Written assessment done

_____ PPE available in variety of sizes

_____ Employees trained

_____ Appropriate use of PPE

Hazard Communication

_____ Inventory of products in use

_____ Material Safety Data Sheets
     for all chemical products

_____ Containers labeled

_____ Written program document

_____ Employees trained

Special Hazards

The following are programs that will be needed in only some environments.   Where any of these hazards occur there should be a program to address it.   Look for:
- A written program document
- Training records for employees
- Control measures (as identified in the program) in use by employees

Respiratory Protection - respirators are available, even if just for voluntary use

Biohazards - bloodborne pathogens, tuberculosis

Noise - if you must raise your voice to be heard the area should be evaluated

Hazardous Waste – substances present in the workplace or that might be responded to in the field that are flammable, toxic, or have a know health risk

Air Contaminants - specific chemical hazards like lead or cadmium; does not include indoor air quality like temperature or humidity

Process Safety Management - hazardous chemicals in substantial quantities

Laboratory - locations that maintain laboratories on site

Confined Space Entry – locations that have confined spaces, even if only contractors are entering and working in them

Energy Control (Lockout) – doing repair and maintenance work on energized equipment. Includes electricity, hydraulics, pneumatics, all sources of energy. It does not apply to plug attached equipment.

Electrical Safe Work Practices – employees who are working on or around energized equipment, electricians, welders

Exposure to Traffic/Working as Flaggers – responsible for setting up traffic control in the public right-of-way for activities like construction, maintenance, and incident response

Material Handling – forklifts, pallet jacks, cranes, hoists

Construction – excavations, scaffolding, fall protection, contractor safety

Workplace Violence – volatile or dangerous clients, working alone in remote locations

Workplace Action Plan

After the evaluation, meet with the key players to formulate an Action Plan. Identify specific activities, be specific about who will do them, and establish timelines for progress reports and completion.

It may not be possible to do all that needs to be done all at the same time. The scoring system can be used to help set priorities but the main thing is to get started.

Emergency Plan

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Vehicles/Drivers

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General

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Personal Protective Equipment (PPE)

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Ergonomics

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Hazard Communication

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Safety Committee

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Special Hazards (be specific)

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