



# City of Petaluma




## Injury & Illness Prevention Program



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<b>City of Petaluma, CA Administrative Policy</b>	<b>Number:</b> <b>Established Date: July 2004</b> <b>Last Revision Date: May 23, 2018</b>
<b>Subject: Injury and Illness Prevention Administrative Policy and Program</b>	<b>Authority: City Manager</b>  <b>Signature, City Manager</b>

## **POLICY FOR THE PREVENTION OF EMPLOYEE INJURY AND ILLNESS**

### **I. PURPOSE**

This policy confirms the City of Petaluma's commitment to maintain a safe and healthful workplace for employees; establishes and implements the City's written Injury and Illness Prevention Program (IIPP); and ensures the City's compliance with all federal and state safety regulations and laws.

### **II. POLICY**

It is the City of Petaluma's policy to achieve and maintain a safety and healthy work environment and to protect employees and the public from unnecessary risks resulting from their operations.

All City Directors, Managers, and Supervisors are responsible for knowing and implementing this policy in their work areas.

A copy of this policy shall be reviewed with and made available to all employees.

All employees are responsible for knowing and complying with safe and healthful work practices established in this policy.

### **III. PROCEDURES AND RESPONSIBILITIES**

- A. The City of Petaluma's Human Resources Director and Risk and Safety Officer are responsible for ensuring the distribution of the City of Petaluma's IIPP policy.
- B. The Human Resources Director and Risk and Safety Officer ensure the distribution of the IIPP policy to all employees.
- C. Department Directors are responsible for ensuring compliance with the policy.
- D. All employees are responsible for understanding and following the guidelines established in this policy.

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- E. Accident/Incident Investigation Report (7.1.1)**
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- G. New Employee Safety Orientation Checklist (9.2)**
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## **INJURY AND ILLNESS PREVENTION PROGRAM**

### **1.0 INTRODUCTION/CITY'S COMMITMENT TO SAFETY AND HEALTH**

The City of Petaluma makes all reasonable efforts to:

- Protect the health and safety of employees and the public;
- Provide safe workplaces;
- Provide information to employees about health and safety hazards;
- Identify and correct health and safety hazards and encourage employees to report hazards;
- Provide information and safeguards for employees regarding hazards arising from operations at the City of Petaluma;
- Recognize that the IIPP also extends to identifying and controlling hazards that may affect volunteers, visitors and the general public

The purpose of this program is to prevent occupational injuries and illnesses in the workplace and to provide a framework for continuous improvement in the safety and performance of the employees of the City of Petaluma. Per California Code of Regulations, Title 8, Section 3203, the City of Petaluma has adopted an Injury and Illness Prevention Program (IIPP), which includes information on the implementation of the safety program's critical elements:

- Program responsibilities
- Compliance methods to ensure safe work practices
- Communication system on occupational health and safety issues
- Hazard assessment and periodic inspections of work areas
- Accident, injury and incident investigation
- Hazard correction
- Occupational Health and safety training
- Record keeping
- IIPP evaluation

All City Directors, Managers, and Supervisors are responsible for knowing and implementing this policy in their work areas. A copy of this policy shall be reviewed and made available to all employees. All employees are responsible for knowing and complying with safe and healthful work practices established in this policy.

The City of Petaluma and its City Manager have the overall responsibility and accountability for providing a safe and healthful workplace for its employees.

Requirements outlined in this program are mandated by regulation where the word "shall" is used and are advisory in nature where the word "should" is used.

## **2.0 RESPONSIBILITIES**

Human Resource Director / Risk and Safety Officer.

The Human Resource Director is responsible for implementation of the City's IIPP.

The Risk and Safety Officer assists the Director in overseeing the implementation of the IIPP.

### **2.1 *Director of Human Resources***

The Director has the authority and responsibility for the implementation and maintenance of the City's IIPP. The Director provides operational leadership and active participation in the implementation of a culture that values safety and continuous improvement.

The Director of Human Resources, together with the executive management team, is responsible for integrating safety into the culture of the City by:

- Providing leadership and resources necessary to implement and maintain the IIPP for the City of Petaluma
- Demonstrating a genuine interest in safety-specific issues
- Ensuring department head actions
- Demonstrating support for safety programs
- Demonstrating that safety is everyone's responsibility
- Advising senior management on occupational safety and health issues
- Working with senior management to develop occupational safety and health guidelines and policies
- Assisting managers with planning, organizing, and coordinating safety training
- Helping managers and department heads develop their codes of safe practices and inspection guidelines
- Supporting managers' efforts and requiring accountability in developing occupational safety and health inspection procedures and monitoring to ensure inspections and necessary corrective actions are completed
- Assisting supervisors in conducting workplace hazard assessments to identify, evaluate, and correct hazards
- Providing training and technical assistance to managers and supervisors on the implementation of the IIPP

The Director will manage these responsibilities by:

- Reviewing the progress of the overall IIPP implementation along with the established goals and objectives with the executive staff annually
- Recommending budget resources are made available to adequately implement and maintain the IIPP

- Designating a Risk and Safety Officer to support implement department-wide safety policies and procedures and to develop tracking and record-keeping systems

## **2.2 Risk and Safety Officer**

The Risk and Safety Officer will act as the safety liaison between the Director and the department operations units and will assist in the program implementation.

The Risk and Safety Officer's responsibilities include:

- Preparing and distributing the City's guidelines, policies, and procedures on occupational safety and health issues
- Maintaining current information on local, state, and federal safety and health regulations
- Serving as liaison with governmental agencies on safety-related issues
- Establishing, supporting, and maintaining an injury/illness/accident report and investigation procedure for use by the supervisors and managers
- Coordinating with the City's administrative staff and/or Human Resources on maintaining injury and illness records
- Reviewing and reporting on injury and illness trends
- Establishing a system for maintaining the records of inspection, hazard abatement, and training
- Reviewing, updating, and evaluating the overall effectiveness of the IIPP
- Evaluating the adequacy and consistency of training conducted by departments

Responsibility for the implementation, administration, and management of the safety program rests with the managers and supervisors.

## **2.3 Department Directors and Senior Managers**

The Department Directors and Senior Managers are responsible for the uniform implementation of the IIPP in the facilities and operations under their immediate control. They are required to be knowledgeable of their departments Safety Policies and Procedures and all employee job hazards in their department/division.

Department Directors and Senior Managers are responsible for:

- Assuring the quality of safety performance by supervisors
- Demonstrating that safety is critically important to them and the City
- Ensuring individuals under their management have the authority to implement appropriate health and safety policies, practices, and programs
- Verifying areas under their management are in compliance with the City's health and safety practices, policies, and programs
- Providing regular safety communication in Department staff meetings

## **2.4 Supervisors**

All supervisors are responsible for IIPP implementation in the facilities or operations under their immediate direction. They are required to be knowledgeable of their departments' Safety Policies and Procedures and all employee job hazards under their direct supervision. Supervisors must provide the leadership necessary to ensure the program's effectiveness.

Supervisors are responsible for implementing and managing the City's IIPP. This includes:

- Investigating all incidents and accidents (including property-related incidents) within their areas of responsibility to determine causes and take corrective/preventative action (this is not to be confused with the Workers' Compensation claim reporting process)
- Conducting documented and regularly scheduled safety inspections within their areas of responsibility
- Ensuring that workplaces and equipment are safe, well maintained, and in compliance with external agency regulations, generally accepted safe practices, and the City's policies, programs, and practices
- Establishing safety-related work rules and procedures for all operations and exposures within their areas of responsibility
- Developing their own knowledge and skills in safety and health relative to their areas of responsibility and ensuring that all employees receive safety training relative to their work exposures
- Ensuring that workplace safety and health practices and procedures are clearly communicated and understood by employees through training programs
- Enforcing health and safety rules fairly and uniformly related to job performance
- Evaluating employees on compliance with safe work practices as part of the performance management process
- Acknowledging employees who contribute to the maintenance of a safe workplace and disciplining employees who fail to follow safe work practices
- Encouraging employees to report workplace hazards without fear of reprisal
- Ensuring that training, inspection, and investigation records and employee health and safety records are maintained and retained for the designated period(s) of time

## **2.5 Employees**

All Employees are responsible for their own safety and the safety of others in the workplace.

Employees are responsible for following the requirements of the IIPP. This involves:

- Keeping themselves informed of conditions affecting their health and safety
- Participating in training programs and instituting training into daily work practices
- Adhering to healthful and safe practices
- Supporting and encouraging co-workers to engage in safe workplace practices
- Advising their supervisors of potential hazards



- Reporting all accidents and injuries immediately
- Reporting all unsafe conditions immediately
- Wearing required personal protective equipment when applicable
- Submitting occupational safety and health related suggestions for improvements in processes and/or procedures

### **3.0 COMPLIANCE**

The City of Petaluma shall ensure that employees comply with safe and healthful work practices. Managers and supervisors are responsible for establishing and maintaining good health and safety practices. To ensure compliance:

- Employees are recognized for following safe and healthful work practices (e.g., oral acknowledgments, recognition at meetings, awards, etc.)

Note: Recognition will not be given to individuals or departments based on the absence of accidents or injuries. This is to avoid reinforcing poor safety-related behaviors that may have yet to be manifested in an incident and to ensure that all incidents and accidents are reported.

- Employees are trained and retrained, as necessary or as required
- Health and safety practices are integrated into employee job descriptions and performance appraisals
- Disciplinary actions are taken with employees for failure to follow safe and healthful work practices
- The anti-reprisal policy for employees reporting safety and health concerns is enforced

### **4.0 COMMUNICATION**

The City of Petaluma will communicate with employees in a form readily understandable by all affected employees on matters related to occupational safety and health, including provisions designed to encourage employees to inform the employers of hazards at the worksite without fear of reprisal.

The City of Petaluma will use various communication systems to relay information to all employees on matters relating to occupational safety and health, including:

- Citywide e-mails and *Safety First* Newsletter
- The safety training program
- The Safety Committee
- Health and safety meetings
- Anonymous and confidential hazard reporting

These systems are described below.

#### **4.1 *The Safety-Training Program***

The safety-training program is an integral component of the communication system. The training program is described in Section 9 below.

#### **4.2 *The Safety Committee***

##### **Charge to The Committee**

The City's Safety Committee is charged with the following responsibilities:

- Advise City management on the City's overall occupational health and safety programs
- Communicate with the Director of Human Resource on the adequacy of the City of Petaluma's occupational health and safety programs and policies
- Recommend needs, priorities, and strategies to promote good occupational health, safety, and environmental practices to the City management
- Review periodically the role of the Committee with senior staff to ensure its continued effectiveness
- Review accident reports
- Review and conduct facility inspections

This Committee in no way replaces or supersedes administration or management's responsibility or authority for health and safety.

##### **Membership**

Appointment to the City of Petaluma's Safety Committee Members shall be according to each Unit's MOU. Its voting members shall consist of at least fourteen representatives from all segments of the City's operations including; Administration, Finance, Human Resources, Planning, Public Works & Utilities, Recreation Services, Fire and Police along with the Director of Human Resources, and a Department Head Liaison. The Chair of the Committee shall be the Director of Human Resources and terms of membership shall be at the City Manager's discretion.

The Committee shall establish such subcommittees from among its membership as it shall deem useful in carrying out its charge. The Committee shall, through the City Manager, seek advice from the City's legal counsel as the City Manager deems necessary and appropriate.

## **Reporting Requirements**

The Safety Committee shall meet quarterly. The Director of Human Resources shall report on any failure to meet or the failure of members to attend to the City Manager.

The Director of Human Resources shall report annually, to the City Manager, on the adequacy of the City's health and safety programs, policies, and organization from the perspective of the Safety Committee.

No later than December 31 of each year, the Director of Human Resources shall provide an annual report to the City Manager summarizing key issues and new policies addressed by the Committee during the committee year. Copies of these reports shall be available to all employees. The Committee or its members may also submit confidential reports to the Director of Human Resources as deemed necessary.

### **4.3 Health and Safety Meetings**

The supervisor conducts health and safety meetings based on the exposures presented and as required by governmental (i.e. OSHA, etc.) requirements.

### **4.4 Employee Hazard Reporting**

Employees are encouraged to immediately correct or report any hazards or unsafe or unhealthy conditions in the workplace. Workplace hazards are reported to the employee's supervisor generally either verbally or via e-mail. All verbal reporting shall be followed-up with an e-mail from the employee's supervisor. All reported hazards will be investigated and evaluated. All verified hazards should be corrected as soon as possible, based on the severity of the hazard. When a minor workplace hazard is identified, employees should remove or remedy it immediately, if it is safe to do so and subsequently notify a supervisor.

Employees may also submit an *Employee Hazard Report* (Appendix A) to ensure documentation, accountability, and a timely response. Employees may complete a form and forward it to their supervisor and/or the Risk and Safety Officer. Employees are encouraged to include their name on the form in order to clarify the concern when necessary, participate in the development of a solution, and receive a written response to their report. Any employee can submit a report, or confidentially report a hazard, to the Director of Human Resources or the City Manager without fear of reprisal.

### **4.5 The City's Anti-Reprisal Policy**

Employees shall not be penalized or discriminated against in any manner for reporting bona fide health and safety hazards to the City of Petaluma or to appropriate governmental agencies.

Supervisors shall inform employees of this policy and encourage reporting of workplace hazards to City management.

## **5.0 VIOLENCE IN THE WORKPLACE POLICY**

Workplace violence is any act or threat of physical violence, harassment, intimidation, or other threatening disruptive behavior that occurs at the work site. It ranges from threats and verbal abuse to physical assaults and even homicide. The City of Petaluma has a zero tolerance policy for workplace violence and provides guidelines for responding to violence or threats of violence in the workplace. This policy prohibits all forms of workplace violence and states that its occurrence will lead to discipline, up to and including termination. It includes the general roles and responsibilities of employees and supervisors. Each supervisor is responsible for ensuring that the employees are trained in this policy. There are specific procedures for responding to:

- **Type I Events**

A Type I event refers to a type of workplace violence (as categorized by Cal/OSHA) where the individual who initiates the violence has no legitimate relationship to the site, such as entering to commit a robbery or other criminal act.

- **Type II Events**

A Type II event refers to a type of workplace violence (as categorized by Cal/OSHA) where the individual who initiates the violence is either the recipient or the object of services provided by the affected worksite, or victim (e.g., the assailant is a citizen or a user of the City's services).

- **Type III Events**

A Type III event refers to the type of workplace violence event as categorized by Cal/OSHA where the individual who initiates the violence has some employment or other involvement with the affected worksite. Usually this involves an assault by a current or former employee, supervisor, or administrator; by a current/former spouse or partner of an employee; a relative or friend of an employee; contractor or some other person who has a dispute with an employee at the worksite.

- **Additional Events**

- Threats of violence
- Acts of violence not involving injuries or weapons
- Acts of violence involving injuries or weapons
- Verbal threats to inflict bodily harm; including vague or covert threats

- Attempting to cause physical harm; striking, pushing and other aggressive physical acts against another person
- Verbal harassment, abusive or offensive language, gestures or other discourteous conduct towards supervisors, fellow employees, or the public
- Disorderly conduct such as shouting, throwing or punching objects, punching walls, and slamming doors

- **Red Flags**

Supervisors and others should rely on training, their own judgment, personal observations, and corroborating information when assessing the likelihood that an employee or other person will commit workplace violence. Behavior of particular significance includes antisocial behavior (i.e. recurring hostility or excessive aggression), erratic behavior, irrational behavior, behavior evidencing use of drugs or alcohol (i.e. incoherent or impaired speech, dilated pupils, alcohol on the breath), and out of ordinary work mistakes or behavior. Acts that may individually appear harmless may, in conjunction with other behavior, indicate a possibility of (or potential for) workplace violence. If there is an immediate safety threat to employees, a supervisor or an employee should call 9-1-1 for assistance.

- **Reporting Red Flag Incidents**

Once the workplace environment has already been deemed as safe, immediately report the potential or actual workplace violence incident to the employee's immediate supervisor, other appropriate manager, or the Department Head. The reporting should not be delayed due to the unavailability of a supervisor, manager, or Department Head.

Workplace violence training will be ongoing and presented both on the department and citywide level by managers, supervisors, and trained professionals.

## **6.0 HAZARD ASSESSMENT AND INSPECTIONS**

The City of Petaluma has the following procedures for identifying and evaluating workplace hazards, including scheduled periodic inspections to identify unsafe conditions and work practices. Supervisors are responsible for seeing that periodic inspections are conducted. The Risk and Safety Officer may assist supervisors to develop self-inspection forms and checklists and guides for inspection and recordkeeping. On request, the Risk and Safety Officer will also conduct or arrange for third parties to conduct periodic surveys to assist the supervisors in identifying and correcting potential hazards.

### **6.1 Inspection Schedule**

Inspections are conducted according to the following schedule:

- Upon initial establishment of the IIPP
- When new substances, processes, procedures, or equipment which present potential new hazards are introduced
- When new, previously unrecognized hazards are identified
- When occupational injuries or illnesses occur
- Periodically as determined by the nature of the exposure
- Each department is fully inspected annually

### **6.2 Outside and Internal Agencies**

Several agencies conduct random, regular, or periodic inspections at the City of Petaluma, to assist the City in achieving some of its inspection responsibilities. These include:

- San Francisco Regional Board (wastewater NPDES permit and pre-treatment program, storm water)
- US EPA and/or its contractors (wastewater NPDES permit and pre-treatment program)
- State Water Board – Division of Drinking Water (water system)
- Marin/Sonoma Mosquito and Vector Control District
- Army Corps of Engineers
- California Department of Fish and Wildlife
- Sonoma County Open Space District
- CalRecycle
- Sonoma County Ag Commissioner's Office.
- Petaluma Wetlands Alliance (monitor the Egret/Heron colony)
- Annual CHP inspections of our buses and driver records
- Triennial Audits by the Federal Transit Administration, some of which include audits of the transit facility, and all audit maintenance records
- Annual opacity testing for bus emissions (California Air Resources Board)
- Fire System inspections (Petaluma Fire Department)
- Hazardous Material inspections (Petaluma Fire Department)

### **6.3 Record Keeping of Scheduled and Periodic Inspections**

Although CalOSHA requires that records of scheduled and periodic inspections to identify unsafe conditions and work practices shall be maintained for a minimum of one year, the City of Petaluma should maintain these records for two years, in case of third party litigation . The records shall include:

- The name(s) of the person(s) conducting the inspection

- Any descriptions of the unsafe conditions and work practices
- The actions taken to correct the identified unsafe conditions and work practices
- *Office Hazard Assessment* (Appendix B), Hazard Assessments and specific training for Fire, Police and Public Works are kept at each location and available upon request
- *Office Safety Inspection Form* (Appendix C), Inspection Forms for Fire, Police and Public Works are kept at each location and available upon request

The supervisor is responsible for maintaining these records and providing a copy to the Risk and Safety Officer.

## **7.0 ACCIDENT, INJURY AND INCIDENT INVESTIGATIONS**

The City of Petaluma investigates all accidents, occupational injuries and/or illness, as well as “near miss “incidents and property damage incidents to reduce the potential for future incidents that could result in injury. A near miss, also known as “a close call,” is an incident or a potential hazard that did not result in an injury, illness, exposure or damage, but had the potential to do so.

The following standardized procedures for reporting and investigating occupational injuries, illnesses, and accidents are reviewed below.

### **7.1 Reporting Procedures**

- Employees shall report all accidents, incidents, near misses and exposures with the potential for injury or damage to their supervisors as soon as possible
- The supervisor immediately contacts the Human Resources and the City Manager to report deaths or serious injury or illness as defined ("Serious injury or illness" means any injury or illness occurring in a place of employment or in connection with any employment which requires inpatient hospitalization for a period in excess of 24 hours for other than medical observation or in which an employee suffers a loss of any member of the body or suffers any serious degree of permanent disfigurement, but does not include any injury or illness or death caused by the commission of a Penal Code violation, except the violation of Section 385 of the Penal Code, or an accident on a public street or highway)
- Human Resources immediately reports any death or serious injury or illness to Cal/OSHA. (Immediately means as soon as practically possible but no longer than twenty-four hours from the City's receipt of knowledge of the serious injury or illness)
- Other incidents will be reported to Cal/OSHA on a case-by-case basis as determined by the Director of Human Resources

For all other injuries, contact the immediate supervisor and/or Human Resources.

### **7.1.1 Standardized Forms For Accident/Exposure/Near Miss Investigations**

- The *Employee and Supervisor Report of Occupational Injury/Illness/Incident* (Appendix D) is to be completed by the employee and supervisor for all injury/illness/exposures or incidents on the day of the injury and submitted to Human Resources no later than the next business day
- Supervisors shall provide Employee's Claim for Workers' Compensation Benefits (Form DWC-1) to the injured employee immediately following any accident or notice of injury that results in lost time or requires more than first aid. Supervisors and employees are to complete and submit the report to Human Resources within one business day
- The Employer's Report of Occupational Injury or Illness (Cal/OSHA Form 5020) is to be completed (within 24 hours by Human Resources for cases when one workday or more is lost by an employee or when medical treatment of the employee is beyond first aid)
- The department supervisor will complete and retain a copy of *the Accident/Incident Investigation Report of Occupational Injury or Illness* (Appendix E) with a copy to the Risk and Safety Officer showing the management analysis of the loss and the corrective action taken by management

If necessary, employees will complete Section 1 and Supervisors' Section 2 of the Near Miss Report (Appendix F) and send a completed copy to the Risk and Safety Officer. All completed report forms are to be submitted to: Human Resource Director or their designee.

### **7.2 Investigation Steps**

The investigation involves the following steps:

- Complete the Accident/Incident Investigation Report of Occupational Injury or Illness (Appendix D)
- Supervisor interviews injured workers and witnesses
- Supervisor examines workplace for factors associated with the accident/exposure
- Supervisor takes photographs as warranted
- Supervisor determines the possible cause of the accident/exposure
- Supervisor takes corrective action, or makes recommendation to his/her superior, to prevent the accident/exposure from recurring
- Supervisor records the findings and corrective actions taken or recommended

The Risk and Safety Officer should review reports for adequacy and provide feedback as appropriate.



## **8.0 HAZARD CORRECTION**

Hazard assessment is an ongoing process. Periodic inspections will be conducted to identify new hazards and to evaluate the effectiveness of controls applied to previously recognized hazards. The City of Petaluma has a commitment to correct unsafe or unhealthful work conditions in a timely manner, based on the severity of the hazards.

### **8.1 *Schedules for Correcting Hazards***

Hazards are corrected according to the following procedures:

- When observed or discovered
- When an imminent hazard exists which cannot be immediately abated without endangering employee(s) and/or property, all exposed personnel will be removed from the area except those necessary to correct the existing condition. Employees necessary to correct the hazardous condition shall be provided with necessary safeguards
- Determination of hazard severity and the time frame for hazard correction will be promptly assessed by a supervisor or manager as appropriate.

### **8.2 *Resources***

Resources to correct hazards include the following:

- Unsafe conditions that cannot be corrected with resources available to the supervisor or manager must be reported to the next higher level of management
- If the correction is outside the authority of maintenance and departmental funds are not available, the departments must seek other resources from the City Manager to make the corrections

## **9.0 HEALTH AND SAFETY TRAINING**

### **9.1 *Training Content***

The City of Petaluma's policy requires that employees are trained to protect themselves from hazards in their working environments. All employees will participate in department occupational health and safety training on general and job-specific hazards and safe work practices. Each supervisor will be trained on all health and safety hazards to which employees under their immediate direction and control are exposed upon being made a supervisor and before their employees are exposed to the hazard. When new substances, operations, or equipment are introduced, supervisor training can be in conjunction with employee training. Directors and managers are responsible for ensuring supervisor health and safety training is complete.

Supervisors and Human Resources shall ensure that employees are trained in:

- General health and safety practices
- Job-specific health and safety practices and hazards
- Recognition and assessment of health and safety risks
- Minimization of risks through sound safety practices and use of protective equipment
- Regulations and statutes applicable to their work
- The City of Petaluma's occupational health and safety policies including this document

## **9.2 Training Program**

The City of Petaluma has organized its training system into the training program, which is described below:

### **Level 1 Training**

- General orientation provided by the Human Resources Department to all new employees using the *New Employee Safety Orientation Checklist* (Appendix G)
- Provide and review with all new employees the *Code of Safe Practices* (Appendix H)
- Information on the City of Petaluma's occupational health and safety policies and practices, employee health and safety rights and responsibilities, health and safety services at the City of Petaluma, and what the employee should expect in terms of further training
- What to do in the event of an accident including immediate injury reporting and how to obtain medical treatment
- A review of the City's Workers' Compensation coverage and the protection it affords injured workers

### **Level 2 Training**

- Provided by the supervisor, department manager, or building safety representatives, in conjunction with the Risk and Safety Officer, to all employees concerning the special hazards that may be encountered relative to their specific duties
- The Risk and Safety Officer reviews Level 2 training for adequacy and consistency
- Training topics may include, hazard communication (i.e., hazard identification, hazardous materials safety, hazard reporting), violence in the workplace, emergency response and evacuation procedures, fire and earthquake safety, rights and responsibilities, personal protection, and record keeping - as applicable
- Outside consultants may be used for aspects of Level 2 training that require special knowledge or expertise that does not exist within the City

### **Level 3 Training**

- Level 3 training is provided by the supervisor or identified instructors for those employees with specific high-hazard exposures including those exposed to public safety, construction, musculoskeletal disorders, excavations, confined space, motor vehicle operation, heavy equipment operation, etc.
- Level 3 training consists of information specific to the hazards and equipment used by these individuals
- Training is by one or more of the following methods: class lecture, safety meetings (formal or informal), one-on-one or team trainings
- Material safety data sheets, videos, pamphlets, booklets, class syllabus, and postings can be used to supplement training
- Outside consultants may be used for aspects of Level 3 training that require special knowledge or expertise that does not exist within the City

The Risk and Safety Officer will be involved in Level 3 trainings.

### **9.3 Training Schedule**

Training shall be provided to all employees:

- When the IIPP is first established
- When new employees are hired
- When employees are given new job assignments for which training has not previously been received
- Whenever new substances, processes, procedures, or equipment are introduced to the workplace and represent a new hazard
- Whenever the City is made aware of a new or previously unrecognized hazard
- When employees become supervisors (so that they can familiarize themselves with the safety and health hazards to which employees under their immediate direction and control may be exposed)
- Periodically as determined by the Director of Human Resources

### **9.4 Training Resources**

- The Risk and Safety Officer will assist departments and supervisors in providing health and safety training to employees on a variety of topics
- Human Resources has forms for maintaining training records
- The Risk and Safety Officer and Human Resources will provide access to a safety video library, a collection of safety publications, and safety professionals to assist supervisors and departments in implementing training programs

### **9.5 Record Keeping of Training Records**

- Documentation of health and safety training for each employee shall include: (1) name or other identifier, (2) training dates, (3) type(s) of training, and (4) training providers. Although CalOSHA requires this documentation shall be maintained for at least one year, the City of Petaluma should maintain this documentation for at least five years, in case of third party litigation
- The supervisor is responsible for maintaining these records for employees
- A copy of all training class schedules and/or training sign-in sheets will be submitted to the Risk and Safety Officer

## **10.0 Record Keeping**

### **10.1 Injury and Illness Records**

The City of Petaluma's policy requires the Risk and Safety Officer to institute and maintain a record keeping system. Record keeping requirements include the following:

- Obtain a report of every occupational injury and/or illness requiring medical treatment
- Record each work related injury or illness on the Cal/OSHA Log Form 300 per the instructions on the log
- Prepare the Cal/OSHA summary form 300A every year and post it no later than February 1 with the Director of Human Resource's signature. The posting shall be posted where the employees can see it and it will remain posted for at least 90 days
- Retain all injury and/or illness records for at least five years
- Records of hazard assessment and periodic inspections, including the name of the individuals conducting the inspection, the unsafe conditions and work practices identified, and corrective actions taken will be retained for a minimum of five years
- Records of employee health and safety training records will include the employee's name and job title, training dates, training curriculum, and name(s) of the person(s) conducting the training and will be retained for a minimum of five years. Safety training that is not provided on a periodic basis should be retained for the duration of employment or a minimum of five years
- Employees, former employees, and their personal and authorized employee representatives, have the right to access Cal/OSHA injury and illness records, with certain limitations including privacy concern cases

The Director of Human Resources will review the log and records of occupational illnesses together with the reports of incidents that are not recordable with the Safety Committee on a quarterly basis to identify patterns and repeat situations. Actions will be taken based on the analysis of these losses to reduce the potential for future losses.

## **10.2 Documentation of Inspection and Training Activities**

Each supervisor will maintain the following records of their activities relative to the IIPP for two years.

1. Records of scheduled and periodic facility inspections

The documentation will include the following:

- Name of person conducting the inspection
- The unsafe conditions identified
- The actions taken to correct the hazard or work practices

2. Records of all safety and health training

The documentation will include the following:

- Name of employee trained and job title
- Date(s)
- Type of training/brief description of training
- Name of trainer

Document content maintained by: Risk and Safety Officer

CITY OF PETALUMA  
INJURY AND ILLNESS PREVENTION PROGRAM

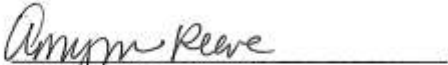
APPROVED BY:



John C. Brown  
City Manager

5/24/18

Date



Amy M. Reeve  
Director of Human Resources

5/23/2018

Date



