



## **Safety Program Assessment**



# Safety Program Update

Presented to District Board of Directors on  
October 3, 2019

Regular Board Meeting

# Objectives

## Safety Assessment Objectives:

The safety program assessment was conducted by Russell Rocha, Safety Consultant from Core Safety Group. The assessment was conducted between the dates of May 15-31, 2019. The purpose of the Safety Program Assessment is to provide SPMUD with an evaluation of their current safety program as it compares to the requirements set forth by CAL-OSHA standards and other best management practices commonly used in general industry.

The Safety Program Assessment was directed towards identifying safety management and loss control practices and briefly addresses safety hazards observed during reviews of the office/shop area and one of their pump stations. The Program Assessment focuses on the following observations:



## Focus

- Safety Manual
- Safety Audits/Inspections
- Safety Training
- Hiring Practices
- Substance Abuse Program
- Accident Investigation & Claims Management
- Contract Agreements & OSHA Interaction
- Disciplinary Policy
- Employee Involvement
- Leadership Commitment

*Recommendations:*

- Update the current IIPP to ensure it aligns with specific company procedures and CAL-OSHA requirements.
- Appoint an IIPP coordinator (as required by CAL-OSHA) to oversee the program.
- Develop and implement a written emergency action plan.
- Update current energy control program (LOTO) to include specific written procedures for equipment at fixed pump stations.
- Develop and implement a written silica exposure program as employees will at times disturb concrete.
- Develop procedures for an OSHA inspection.
- Review the safety manual policies and procedures annually to ensure all updates have been added.

### *Recommendations:*

- Update current IIPP to include a schedule to conduct workplace safety reviews and who is responsible for conducting them.
- Conduct unannounced safety reviews on a frequent basis.
- Document safety reviews and ensure action items are listed and completed as necessary.
- Update the current report format to include SPMUD specific hazards and work locations to better capture relevant information.
- Distribute reviews to all leadership employees.
- Develop a file and keep a record of all reviews and abatement for future reference.
- Consider using an outside source such as your current insurance loss control team or a 3<sup>rd</sup> party safety consulting business for assistance in these reviews as they can give you an outside perspective.

Safety Inspection / Audits  
4/10

*Summary:*

SPMUD does not conduct facility or location safety inspections although it is listed within their IIPP when they are to be conducted. The IIPP does not list who is to conduct these inspections nor does it list a specific time frame of when to conduct them. The IIPP lists the general requirements of CAL-OSHA inspection requirements, but as stated they are not being conducted, thus there are no records of any inspections. Sam Rose and his team do review work areas and make improvements as needed, but this is not a formal process. Although a formal inspection process is not in place, the observations made during this assessment showed very clean, orderly and well-maintained sites and equipment. It does appear that the SPMUD team takes corrective action when they see potential hazards and then strives to maintain a safe working environment.

Safety Inspection / Audits  
4/10

*Recommendations:*

- Consider using outside vendors more frequently to conduct safety training as employees could respond better to hearing safety items from a 3<sup>rd</sup> party voice.
- Conduct hands on confined space rescue training utilizing different scenarios. This has been completed in the past, but more training in this field is highly recommended.
- Create an annual training list that will prioritize training based on needs and work schedules.
- Update the formal orientation program and review for approval, ensuring to include any new changes or CAL-OSHA or SPMUD updates.

Safety Training  
8/10

*Recommendations:*

- Update the employee safety manual as the last update is listed as completed in 2017.

Hiring Practices  
9/10



*Recommendations:*

- Incorporate the D&A policy into the district IIPP.
- Consider post injury/accident testing for all employees.

Substance Abuse Program  
8/10

*Recommendations:*

- Create a more formal written accident/incident investigation program to include near misses.
- Ensure near misses are investigated with the same process as any incident as these can be leading indicators of injuries that could happen and be prevented.
- Outline who is to conduct, when to conduct and the full process for conducting any workplace incident.
- Provide details on who is to contact CAL-OSHA and when to contact them after any serious injury; guidelines need to match current CAL-OSHA requirements; it would be recommended to place this wording within the written procedures.
- Formal accident Investigation training should be conducted for all employees with more comprehensive training given to supervisors.

Accident Investigation & Claims  
Management  
7/10

*Recommendations:*

- Review the listed insurance requirements to ensure they still align with the District current standards.
- When hiring contractors for field work such as excavation, it is recommended to ask for and obtain their written safety program (IIPP) and specific polices such as confined space entry. If any contractor is to enter and work within a confined space, then training documentation would also be recommended to be obtained and reviewed.
- Ensure the District GM signs the OSHA 300 log prior to posting.

Contract Agreements & OSHA Interaction  
8/10

*Recommendations:*

- No recommendations are being offered.



Disciplinary Policy  
10/10

*Recommendations:*

- Update current IIPP communication wording to ensure it aligns with District policy and CAL-OSHA requirements.
- Consider the use of a labor-management safety and health committee. Although not a requirement per CAL-OSHA, this can be a great tool to help all work together towards a goal of zero injuries.
- Consider using an employee perception survey to help understand how current employees feel about the company.

Employee Involvement  
8/10

*Recommendations:*

- As noted within this assessment, site safety reviews need to be conducted and once they are in place, then they should be part of the monthly review process with the Board.
- Develop safety goals that can be reviewed monthly by all. Ensure the goals are agreed to and that they are actually obtainable and can be measured.
- Within the listed vision, mission and core values listed on the District website, consider changing this mission statement bullet point (current wording) “Provide outstanding sanitary sewer service”; (propose wording) “Provide outstanding and safe sanitary sewer service”.

Leadership Commitment  
8/10

## Safety Assessment Scores (0-10)



Overall Score  
77/100

- Some Items Staff will move to correct immediately
- Others, we would like to leave to the (proposed) Regulatory Compliance person to take the lead.



Moving Forward



## Experience Modification Rate

- EMR is a very important safety performance indicator, created by the National Council of Compensation Insurance (“NCCI”), and is used by insurance companies in determining workers compensation insurance premiums. EMR measures a company’s accident and injury prevention and management, as well as gauges a company’s safety performance and culture. Notably, EMR is a multi-year trailing indicator, which means injuries that occurred up to three years in the past impact a company’s current year EMR.



EMR

## WHY DOES EMR MATTER?

- An EMR of 1.0 indicates a company's safety performance is the same as other companies in the same designated industry (the standard average), whereas an EMR lower than 1.0 - indicates a company is better (works safer) than other companies in the same industry. Conversely, an EMR of greater than 1.0 indicates that a company is at a higher risk of workplace injuries as compared to other companies in our industry.

SPMUD EMR = **0.72**

# QUESTIONS?

