The City of Saint Paul
Saint Paul, Minnesota
AWAIR PROGRAM

STATEMENT OF POLICY

The City of Saint Paul, and its departments and offices are committed to maintaining a safe and healthy work environment. Managers and supervisors are responsible for the establishment and maintenance of good health and safety practices in their respective units.

A workplace accident and injury reduction (AWAIR) program is intended to ensure that the foundation elements of a safety program (e.g., goal setting, allocation of resources, assignment of responsibilities, performance measurement, etc.) are in place. These key elements must be in place to ensure the success of our safety and health programs and initiatives.

This AWAIR program is intended to create compliance with Minnesota Statute 182.653.

SCOPE AND APPLICATION

This program applies to all employees and work performed at all City departments and City offices. However, due to their NAICS code, five departments are required to have their own department specific AWAIR program. These departments include: Fire and Safety Services, Parks and Recreation, Police, Public Works and Saint Paul Regional Water Services (SPRWS).

PROGRAM ELEMENTS

1. **GOALS AND OBJECTIVES**

    1.1 **General**. A formal, written set of safety goals and objectives for accomplishing those goals shall be developed. Goals should be formalized, attainable, and quantifiable.

    1.2 **Work plan**. A formal, written work plan, geared towards accomplishing stated goals shall be developed, and updated periodically.

    1.3 **Responsibility**. It is the responsibility of managers and supervisors to develop goals, objectives, and the work assignments, etc. and to provide controls which comply with accepted practices.

2. **HAZARD IDENTIFICATION AND CONTROL**

    2.1 **General**. This section outlines the methods used to identify hazards of new and existing conditions, work assignments, etc. and to provide controls which comply with accepted principles.

    2.2 **Inspections and Audits**. Work place hazards will be identified through assessment of job tasks (i.e. job hazard analysis, etc.), periodic review of loss control data, and site inspections that focus on the possibility of workplace exposure. Particular attention will be paid to operations that have a history of illness or accidents, or that routinely expose staff to hazardous substances, harmful physical, infectious agents or other hazards.

    2.3 **Reporting Unsafe Conditions**. All employees have a responsibility to report unsafe working conditions as soon as possible. Employees should report hazards to any of their immediate supervisors or their department or offices' safety person, if one exists.

It is the department or offices' safety committees' responsibility to determine whether or not a hazardous condition actually exists and to initiate corrective actions when/if necessary.

2.4 **Corrective Action/Hazard Control**. Priorities for corrective action will be established based on the risk and potential cost of the identified hazards. Corrective action will be implemented considering:
- The severity of hazards and the likelihood of loss or injury; and
- Standards, regulations and the feasibility of the corrective action.

Once hazards are identified they should be eliminated or mitigated to the degree it is feasible.

The hierarchy of control strategies is as follows:
- Engineering controls – Engineering controls are precautions that completely eliminated the hazard from the process. Examples include elimination of hazardous equipment or chemicals, substitution, enclosure or guarding of hazards, etc. Engineering controls are almost always the preferred method of hazard control. All reasonably feasible engineering controls should be exhausted before other measures are taken.
- Administrative controls – If engineering controls are not feasible, administrative controls such as Safe Operating Procedures (SOPs), task modification, or work schedule adjustment may be used to reduce the chance of hazard exposure.
- Personal Protective Equipment (PPE) – PPE may be used if no feasible engineering or administrative alternatives are available or when they fail to completely control the hazard.

3. **TRAINING AND COMMUNICATION**
   3.1 **General**. Each employee covered by this program shall receive training which complies with this section. Upon completion of training, employees should:
   - Understand the basic functions and purpose of our safety program;
   - Know their rights and responsibilities for safety;
   - Understand the mandatory hazard reporting policy;
   - Understand procedures for reporting injuries and illnesses; and
   - Be familiar with the major safety rules o his/her work assignments.

   3.2 **Frequency of Training**. Training must be provided to an employee before initial assignment.

   Additional training must be provided whenever the circumstances such as a change in policy, SOP or related rules occur.

   Training updates must be repeated at intervals of not greater than one year. Training updates may be brief summaries of information included in previous training sessions.

   3.3 **Content of Training**. At a minimum, training shall consist of:
   - Summary of our safety program;
   - Employee safety rights and responsibilities;
   - Policy on mandatory hazard reporting, and procedure for reporting hazards;
   - Policy on injury and illness reporting, and procedure or reporting; and
   - Safety rules and enforcement including review of rules and SOPs.

   3.4 **Records of Training**. Records of training shall be maintained and retained for three years. At a minimum, training records shall include:

- The dates training was conducted;
- The name, title, and qualifications of the person who conducted the training;
- The names and job titles of employees who completed the training; and
- A brief summary or outline of the information that was included in the training session.

3.5 **Unacceptable Forms of Training**. The following types of training, <u>*by themselves*</u>, do not constitute training, and do not comply with this program or the regulation:
- Giving an employee a data sheet, package insert, reference manual or any other printed material to read;
- Watching a video or computer-delivered presentations on its own, especially when the material in the video is not specific to the operation and hazards at hand; and
- Any type of training which does not include an opportunity for employees to ask questions to ensure they understand the information presented to them.

However, audiovisuals, interactive videos, printed materials, etc., may be used as a component of the training program if they are supplemented by specific information related to the employees' job and related exposures, and if employees are permitted to ask questions and have them answered.

3.6 **Responsibility**. It is the responsibility of managers and supervisors to ensure that the requirements of this section are complied with.

4. **INJURY AND ILLNESS REPORTING AND INVESTIGATION**

4.1 **General**. Any employee who is injured or who suffers illness caused by their job must report the injury to the immediate supervisor as soon as possible, but no later than twenty-four hours after occurrence. The employee shall also complete the Employee's Safety Report and provide it to their direct supervisor or manager within this time period.

4.2 **Investigation**. In all cases, some degree of investigation or analysis will occur. The degree to which cases are investigated will be based on the severity (either actual or potential) of the case at hand. The purpose of an accident investigation is to determine causal factors and not fix blame. Each Department will follow the City of Saint Paul's workers' compensation reporting process.

4.3 **Recordkeeping**. The supervisor will complete the Supervisor Safety Report and the First Report of Injury within twenty-four hours after any reported employee workplace injury or illness is reported to them. All completed documents must be submitted to the following:
- Workers Compensation Division of Risk Management/Human Resources;
- Division Manager of the Department of Office; and
- Safety Person of the Department or Office or Person charged with safety tasks.

Additionally, it may be necessary to record the case on the OSHA 300 log, depending on whether or not the case meets the definition of a "recordable case," as defined on the 300 form itself.

5. **SAFETY RULES AND ENFORCEMENT**
5.1 General. Safety rules will be developed and communicated through a variety of means. These may include incorporation in written SOPs, signs and postings, safety rule publications, handbooks, etc. In all cases, safety rules will be stated clearly and in a manner which is understood by all employees. Safety rules will always be phrased in a

manner which clearly implies the rule is mandatory and not suggested (i.e. words such as "should" or "may" will not be used when compliance is mandatory).

5.2   Enforcement of Safety Rules. Safety procedures will be enforced in every department. Enforcement must be fair, consistent and based on established policy. Supervisors must assure engineering controls are used, SOPs are followed, and PPE is used correctly. If an employee is observed committing an unsafe act or is in violation of the established safety procedures:

- Instruct the employee in the safe operation or procedure;
- Show the employee the correct procedure; and
- Follow-up after the training to ensure the safety practices are followed.

All disciplinary action will comply with applicable City of Saint Paul policies and procedures.

PROGRAM EVALUATION

At least annually, a formal, documented review shall be conducted to ensure that the provisions of the current written program are being effectively implemented and that it continues to be effective.