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Safety Awareness and Training	ACA Standards: 2-CO-1C-05, 4-4212M, 4-4420, 4-ACRS-1C-10M, 4-APPFS-3B-07		
Joe M. Allbaugh, Director Oklahoma Department of Corrections		Signature on File	

Safety Awareness and Training

The Oklahoma Department of Corrections’ (ODOC) safety awareness and training programs provide the public, employees, inmates and visitors with a supportive, safe, and healthy work and living environment.

This is accomplished through designated staff providing appropriate training for staff, conducting appropriate inspections to identify workplace hazards, and investigating accidents to prevent reoccurrence. Additionally, employees responsible for the supervision of inmate workers will be trained on basic general occupational health and safety rules and will be provided the required resources to provide training to inmates to safely perform their assigned duties.

I. Definitions

A. Terms

For the purpose of this procedure, the following terms are defined as follows:

1. Inmate

Anyone under the authority, custody or care of a prison or a community-based facility operated by, or contracted with, the Oklahoma Department of Corrections (ODOC).

2. Safety Consultants

Field staff, who are assigned to the Environmental Health and Safety Unit, and report directly to the workplace safety manager.

3. Safety Designee

Appropriately trained employees that have been designated by the facility head/district/unit administrator to perform safety related duties as outlined in this procedure.

4. Director of Environmental Health and Safety

The designated staff person who provides administrative oversight of the Safety Unit and reports directly to the Chief of Operations.

II. Introduction

A. Training and Equipment

All employees and inmates are to be provided appropriate training and equipment prior to working in a potentially unsafe work environment.

B. Hazard Reporting

Staff will assist in identifying, controlling, and reporting unsafe conditions and workplace hazards.

1. Employees will immediately inform their supervisors of any safety related situations beyond their ability or authority to correct.
2. Employees are encouraged to report all safety violations.
3. Once identified, work place hazards will be immediately reported to the safety consultant/safety designee or the employee's immediate supervisor.

III. Written Plans

A. Facilities and Districts (4-4420, 4-APPFS-3B-07)

All facilities and districts will implement and maintain a written safety plan.

B. Guidelines

At a minimum, written safety plans will follow the guidelines set forth in this procedure and provide sufficient details to define the responsibilities and authority of all employees. The following requirements of state statute O.S.40 § 403 will be included:

1. Implement and reinforce agency commitment to staff and inmate safety and health issues;
2. Provide written procedures for identifying and controlling workplace hazards;
3. Develop and communicate safety plans and work procedures to affected persons; and

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4. Provide safety training for supervisory staff, other employees, and inmates.

IV. Safety Program Goals

The goal of the agency's safety awareness program is to reduce incidents and the severity of injuries and illnesses by providing appropriate training and information relevant to workplace safety

V. Safety Rules

A. Communication

Each safety consultant/safety designee and supervisory staff will communicate safety procedures to all employees and inmates.

B. Guidelines for Establishing Safety Rules

At a minimum, safety rules and practices will address:

1. Employees' and inmates' personal responsibility to follow safety rules and practices;
2. Reporting unsafe conditions;
3. Proper housekeeping, maintenance and sanitation;
4. Appropriate clothing that includes the use of personal protective equipment (PPE), as required;
5. Participation in safety training;
6. Injury reporting; and
7. Appropriate waste disposal.

C. Documentation for Employees

Each facility/unit/district will document employee receipt and understanding of safety rules upon employment and anytime work practices or job functions substantially change. Documentation will be maintained in the employee's personnel file.

D. Documentation for Inmates

Inmate work crew supervisors will ensure all inmates are trained in health and safety rules that are applicable to their job assignment before the

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inmate is assigned his/her duties and when work practices or job functions change.

E. Responsibility of the Inmate Work Crew Supervisors

Each supervisor shall:

1. Provide safety training to inmates utilizing the inmate safety program located on the agency website;
2. Ensure a training roster is completed for each course being conducted and that rosters are signed by each inmate in attendance utilizing [Attachment F](#) entitled "Inmate Attendance Roster" (attached);
3. Ensure sufficient time for the presentation of the training material and sufficient time for inmates to complete the required test for each training course;
4. Ensure each inmate successfully completes the test that corresponds with the training course;
5. Ensure all copies of course rosters and tests are filed, maintained and available for review upon request; and
6. Ensure all safety training conducted is entered into the inmate's individual training record located within the Online Program Participation Application Database no later than the 5th day of the following month.

VI. Facility Safety Consultant/Safety Designee

A. Responsibility of the Safety Consultant

The safety consultant will report to the workplace safety manager and will have sufficient authority to implement the facility/unit/district written safety plan to include:

1. Developing and communicating safety plans, rules, and work procedures, as approved by the facility/district/unit administrator, for identifying and controlling workplace hazards;
2. Assisting supervisors in providing training for employees and inmates in safe and healthy work practices;
3. Conducting a thorough review of each work place accident,

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whether or not it results in an injury, to determine the cause of the accident and to prevent recurrence;

4. Coordinating the activities of the safety committee;
5. Maintaining a complete Chemical Inventory List (CIL) and Safety Data Sheets (SDS) reference manuals in accordance with [OP-150310](#) entitled "Hazard Communication";
6. Assisting in the development of emergency plans, as required;
7. Maintaining a listing of identified workplace hazards and abatement plans;
8. Conducting inspections for compliance with codes, regulations and standards in all areas, at a minimum of once a month, in accordance with [OP-130107](#) entitled "Standards for Inspections" and utilizing [DOC 130107B](#) entitled "Monthly Health and Safety Inspection Report"; (4-4212M, 4-ACRS-1C10M)
9. Maintaining operational and work procedures for job functions;
10. Establishing workplace objectives to address agency safety goals;
11. Establishing safety recognition activities;
12. Working with outside regulatory agencies and the Environmental Health and Safety Unit in accident investigations, safety inspections, and annual audits;
13. Maintaining all relevant safety records; and
14. Performing the related duties of the safety designee (outlined below) at designated facilities as required.

B. Responsibility of the Safety Designee

Each facility head/district/unit administrator may designate a qualified staff member to serve as the safety designee. The safety designee will report to the facility head/district/unit administrator and perform safety related duties to include, but not limited to:

1. Compiling weekly inspection reports, quarterly fire and weather drill reports, and other safety related documentation for review and maintenance by the assigned safety consultant;

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2. Assisting with periodic inspections of fire alarms, sprinkler systems, fire extinguishers, kitchen hoods or other fire equipment;
3. Serving as a member on the safety committee;
4. Serving as the facility safety contact for outside agencies and contractors; and
5. Assisting with annual updates of the facility CIL and SDS manuals.

VII. Safety Training

Safety training is designed to reduce the incidence of workplace accidents, illnesses, and injuries. The Training and Staff Development Unit will maintain records to ensure all employees receive the required safety training in accordance with this procedure. Staff supervising inmates will be responsible to ensure inmates in their area are properly trained as well. The designated safety consultant/safety designee will assist in providing training materials as needed.

A. Development

1. In accordance with 40 O.S. § 403, safety training is to be provided to all employees on a quarterly basis.
2. The extent and content of safety training is determined by the training officer based on:
 - a. Essential function of each position and the affected employee's exposure to potential safety and health hazards;
 - b. The frequency and severity of accidents and injuries for specific classes of employees; and
 - c. Rules promulgated by regulatory agencies such as Occupational Safety and Health Administration (OSHA), Oklahoma Department of Labor (ODOL), Environmental Protection Agency (EPA) and the Oklahoma Department of Environmental Quality (ODEQ).

B. Content

The employee and inmate safety training program will provide training relevant to the work performed, with the goal of reducing worker injury and illness. Safety training will include:

1. The responsibility of the individual for their own health and safety and the health and safety of their co-workers and inmates under

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their supervision;

2. The responsibility of immediate supervisors to review safe work practices of their employees and inmates including:
 - a. Recognizing and reinforcing work safety; and
 - b. Correcting employees and inmates who fail to follow safety rules or safe practices and instructing them in proper procedures.
3. The proper use and maintenance of personal protective equipment (PPE) and the circumstances for its use;
4. Equipment maintenance;
5. Emergency procedures; and
6. The workplace safety manager will review and update training materials at least annually or more frequently, upon regulatory changes.

C. Documentation

Training participants must complete and sign the required information on the roster and be present for the entire training in order to receive training credit.

D. Evaluation

Each facility/district's health and safety program will be evaluated by the designated safety consultant or safety designee annually, by September 1 of each year, utilizing the "Annual Health and Safety Evaluation Form" ([DOC 100401E](#), attached).

VIII. Communication

A. Enforcement

1. Facility/unit/district heads will ensure that all employees and inmates are aware of safety rules, standards, and codes required by outside regulatory agencies (ODOL, OSHA, ODEQ, etc.) by maintenance of these materials or conspicuous postings in areas accessible to all employees and inmates.
2. The Oklahoma Department of Labor (ODOL) requires the posting of the Occupational Safety and Health Act of 1970 (OSH act), P.L. 91-

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596 (OSHA form 3165-O9R) or the state equivalent poster. The federal poster and the state form is available on the ODOL website at <http://www.ok.gov/odol/>.

B. Responsiveness

Facility/unit/district heads will be prompt in isolating and correcting unsafe conditions reported to them by employees and inmates.

IX. Safety Committees

A. Composition

Each facility/unit/district will form a safety committee comprised of supervisory personnel, the safety consultant/safety designee and additional employees appointed by the facility/unit/district head.

B. Term

Safety committee members will generally serve a minimum term of one year.

C. Administrative Responsibilities

Administrative responsibilities of the safety committee include:

1. Holding quarterly meetings or more frequently as needed;
2. Establishing formal meeting agendas; and
3. Maintaining written minutes of safety committee meetings.

Meeting minutes will be provided to the facility/unit/district head for review.

D. General Responsibilities

General responsibilities of the safety committee include:

1. Inspecting the facility/unit/district safety and health practices and providing general safety awareness;
2. Planning improvements to existing safety and health rules, procedures and practices;
3. Recommending suitable hazard elimination, reduction, and control measures;
4. Reviewing and updating existing work practices and hazard controls;

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5. Assessing the implications of changes in work tasks, operations, and processes;
6. Monitoring and evaluating the effectiveness of safety and health recommendations and improvements;
7. Reviewing workplace accident reports; and
8. Reviewing and analyzing accident and injury data.

X. Hazard Identification and Abatement

A. Planning

Each facility/unit/district's written safety plan will include the identification of any work place hazards and efforts for correcting them in a timely manner. (4-4420, 4-APPFS-3B-07)

B. Methods

At a minimum, hazard identification and abatement includes the following methods:

1. Safety audits;
2. Analysis of past accident reports;
3. Workers' compensation claims analysis;
4. Industry recommendations;
5. Safety training program evaluations;
6. Work rules;
7. Inspections and work place evaluations;
8. Facility/unit/district objectives;
9. Review of first aid station logs;
10. Review of employee suggestions and complaints;
11. Review of and communication to employees regarding the status of corrective projects;
12. Conduct a Hazard/PPE Assessment for all job tasks of the

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workplace utilizing the “Personal Protective Equipment Hazard Assessment, Equipment Selection and Training Documentation” ([DOC 100401D](#), attached); and

13. Ensure that a medical evaluation and a fit-test are completed before any staff member or inmate uses a respirator.

XI. Accident Fact Finding Investigations

A. Purpose

The purpose of the accident fact-finding investigation is to identify the causes and to prevent the recurrence of accidents. All workplace accidents will be investigated by the safety consultant/designated staff and reported to the director of Environmental Health and Safety and the affected regional director.

1. Fact finders will reassure those interviewed that their statements will be used to correct conditions that contribute to injuries and illnesses.
2. Fact finders will ensure that any hazardous conditions discovered are promptly corrected.

B. Fact Finding Process

All job related accidents resulting in injury, or having the potential to cause injury to employees, are to be reported immediately in accordance with [OP-110345](#) entitled “Workers’ Compensation Insurance and Accommodations for Injured/Impaired Employees.” All job related accidents resulting in injury, or having the potential to cause injury to inmates, are to be reported immediately. The incident will be investigated promptly by a trained accident investigator such as the safety consultant, immediate supervisor of the involved employee or inmate, or another employee as designated by the facility head/district/unit administrator.

1. The results of each investigation will be summarized utilizing the “Incident/Accident Investigation” ([DOC 100401A](#), attached), “Safety Officer’s Investigation Summary.” ([DOC 100401B](#), attached) Any employee or inmate who is involved in, witnesses or has knowledge of an incident involving inmates or employees will record the incident on the “Incident/Staff Report” ([OP-050109](#), [Attachment A](#)) and submit it to the facility/unit/district human resource management specialist/representative (HRMS) within seven working days.
2. The facility/unit/district human resource management

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specialist/representative will provide copies of the accident report to the:

- a. Appropriate regional director; and
 - b. Agency workers' compensation claims administrator.
3. In addition to any injured employee(s) and/or inmate(s), all witnesses are to be interviewed as quickly as possible.
 4. When a formal police report or other official non-departmental investigation is conducted by any government agency, a facility/unit/district designee will obtain the name, badge number, and agency/or business card of the investigator. The designee will also inquire as to when the official report will be available.
 5. The Environmental Health and Safety Unit may conduct or appoint field officers trained in accident investigations, to perform follow-up accident investigations.

XII. Secondary Accident Investigations

A. Initiation

1. The Environmental Health and Safety Unit may initiate secondary accident investigations when one or more of the listed circumstances occur; all public, employee, contractors, and inmate accidents are included:
 - a. A person is seriously injured to the extent that medical or emergency treatment is needed beyond first aid or there is the possibility of long-term consequences as the result of a workplace accident;
 - b. More than one person is injured in the same incident;
 - c. Where there is the propensity for an accident/injury to reoccur if changes are not implemented;
 - d. When inmates are seriously injured; or
 - e. A Workers' Compensation incident as defined in [OP-110345](#) entitled "Workers' Compensation Insurance and Accommodations for Injured/Impaired Employees" is filed.
2. Referrals for secondary investigations, which are outside of the scope listed above for investigation by the Environmental Health and Safety Unit, will be referred through the appropriate chain of

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command. The request will be completed on the “Referral for Secondary Accident Investigation” form ([DOC 100401C](#), attached).

B. Incident/Accident Secondary Investigation Distribution

1. All incident/accident investigations will be completed and sent to the Chief of Operations, the associate director of Administrative Operations and appropriate regional director for review and distribution.
2. At a minimum, secondary investigations will address the details of the accident and the persons involved, to include witnesses, root cause, and recommendations for corrective action.

XIII. Records

A. Record Keeping System

A sound record keeping system, required by regulatory agencies, is necessary to evaluate progress in achieving agency goals and to help plan future safety program enhancements. Safety records will be retained in accordance with [OP-020202](#) entitled “Management of Office Records.”

B. Record Review

Each facility/unit/district will maintain, at a minimum, the following records for periodic and annual review by the responsible safety consultant:

1. Records of employee safety training;
2. Employee first aid station records;
3. Hazard identification and abatement status;
4. Accident investigations;
5. Employee safety suggestions;
6. “Oklahoma 300 Log” ([OSHA form](#));
7. “Sharps Injury Log” ([OSHA form](#));
8. Inspections and safety audits; and
9. Hazard communication, SDS, and chemical inventory lists.

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XIV. Safety Equipment/Personal Protective Equipment (PPE) and Protective Clothing

A. Availability of PPE

The facility/unit/district head and the safety consultant/safety designee will ensure that the required PPE and other safety equipment are available and accessible as needed.

B. Training

1. The facility safety consultant/safety designee will provide staff training in the proper use and maintenance of PPE and protective clothing before use.
2. Staff supervising inmates will provide training in the proper use and maintenance of PPE and protective clothing before inmate use.

C. Safeguards

Safeguards, safety appliances, or devices furnished for the protection of employees and inmates will comply with the specifications of the appropriate applicable jurisdictional regulatory agency and manufacturers' recommendations.

D. Proper Use of PPE and Equipment

The proper use and maintenance of required safety equipment and safety clothing will be enforced for affected employees/inmates.

XV. Housekeeping and Maintenance

A. Purpose

Good housekeeping and maintenance improves the appearance of the work place and helps to prevent fires, accidents, and personal injuries.

B. Inspections

In accordance with [OP-130107](#) entitled "Standards for Inspections," housekeeping and maintenance/sanitation inspections are intended to identify and correct:

1. Trip hazards;
2. Overhead hazards;
3. Clutter;

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4. Fire hazards;
5. Health hazards;
6. Tool and equipment maintenance; and
7. Mechanical, electrical, and hydraulic system problems.

XVI. References

OP-020202 entitled "Management of Office Records"

OP-050109 entitled "Reporting of Incidents"

OP-110345 entitled "Workers' Compensation Insurance and Accommodations for Injured/Impaired Employees"

OP-130107 entitled "Standards for Inspections"

OP-150310 entitled "Hazard Communication Program"

OSHA Act, Title 29 CFR 1910.

O.S. 40 § 403

XVII. Action

The regional director, facility/unit/district head and workplace safety manager is responsible for compliance with this procedure.

The chief of Operations is responsible for the annual review and revisions.

Any exceptions to this procedure will require prior written approval from the agency director.

This procedure is effective as indicated.

Replaced: Operations Memorandum No. OP-100401 entitled "Safety Awareness and Training" dated November 3, 2016

Distribution: Policy and Operations Manual
Agency Website

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<u>Referenced Forms</u>	<u>Title</u>	<u>Location</u>
DOC 100401A	“Incident/Accident Investigation”	Attached
DOC 100401B	“Safety Officer’s Investigation Summary”	Attached
DOC 100401C	“Referral for Secondary Accident Investigation”	Attached
DOC 100401D	“Personal Protective Equipment Hazard Assessment, Equipment Selection and Training Documentation”	Attached
DOC 100401E	“Annual Health and Safety Evaluation Form”	Attached
DOC 100401F	“Inmate Training Roster”	Attached
DOC 130107B	“Monthly Health and Safety Inspection Report”	OP-130107
<u>Referenced Attachments</u>	<u>Title</u>	<u>Location</u>
Attachment A	“Incident/Staff Report”	OP-050109

