



SAN FRANCISCO JUVENILE PROBATION DEPARTMENT
POLICY AND PROCEDURE MANUAL
ADMINISTRATION
INJURY AND ILLNESS PREVENTION PROGRAM

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1.0 INTRODUCTION

JUVENILE PROBATION DEPARTMENT HEALTH AND SAFETY POLICY

The San Francisco Juvenile Probation Department (JPD) is fully committed to protecting the health and safety of our employees, contractors, and the communities we serve. JPD acknowledges that providing a safe and healthy work environment for all employees is the employer's responsibility as provided by Federal and State occupational safety and health statutes and regulations. Where laws and regulations do not exist, it is the responsibility of JPD management to establish internal practices that promote the prevention of injury and illness. Participation by all employees in ensuring a safe and

healthy work environment at JPD is both encouraged and expected. The Juvenile Probation Department will conduct its operations and maintain its facilities and equipment in compliance with the California Occupational Safety and Health Administration (Cal/OSHA) and other applicable safety and health regulations. Employees are required to follow the rules and procedures and to observe appropriate local, state, and federal safety regulations in the performance of their assigned duties. Safety and health are important performance measures and are a consideration in evaluating the effectiveness of management and non-management employees.

2.0 PURPOSE

All employees of the City and County of San Francisco benefit from a safe and healthy work environment. It is the goal of JPD to maintain an injury and illness-free workplace. To achieve this goal, JPD has established and implemented an Injury and Illness Prevention Program (IIPP) to guide JPD employees, who share in the responsibility of ensuring a safe and healthy workplace.

3.0 BACKGROUND AND REGULATORY REQUIREMENTS

Every California employer must establish, implement, and maintain a written IIPP. The requirements for the IIPP are defined in Title 8 of the California Code of Regulations, Section 3203, and must include the following elements:

- Management Commitment & Assignment of Responsibilities
- Hazard Assessment
- Hazard Correction
- Accident, Incident, Exposure Investigation
- Employee Communications
- Employee Compliance
- Health & Safety Training
- Recordkeeping

4.0 OVERVIEW

To provide a safe and healthy work environment for all JPD employees, an Injury, and Illness Prevention Program has been established and implemented which includes but is not limited to the following key components:

- Management Commitment & Assignment Responsibility: To designate the person(s) responsible for program implementation.
- Hazard Assessment: To establish a system for identifying and evaluating workplace hazards.
- Hazard Correction: To standardize methods and procedures for correcting unsafe or unhealthy work conditions and practices and assure that such work conditions and practices are corrected in a timely manner based on the magnitude and severity of the hazard.
- Accident, Incident, Exposure Investigation: To determine the root causes of

accidents, exposure, and on-the-job injuries.

- **Employee Communication**: To establish a system for communicating health and safety information to employees and encouraging employees to inform the management of perceived risks without fear of reprisal.
- **Employee Compliance**: To ensure that employees comply with safe and healthy work practices.
- **Health & Safety Training**: To instruct and coach employees on general safe and healthy work practices and specific hazards to an employee's job assignment or classification.
- **Recordkeeping**: To maintain and organize all the documents, reports and records related to employees' health and safety.

This IIPP is intended to be ever evolving and will reflect our progress towards the continuous improvement of the health, safety, and welfare of our employees.

5.0 DEFINITIONS

CAL/OSHA: California Occupational Safety and Health Administration, a division of the Department of Industrial Relations for the State of California. This agency is responsible for promulgating and enforcing health and safety regulations.

CAL/OSHA Reportable Incident: A fatality or a serious injury or illness that results in:

- Deaths
- Hospitalizations (Note that the 24-hour threshold for reporting has been eliminated. All hospitalizations except for observation or diagnostic testing now require reporting)
- Amputations
- Loss of an eye
- An injury that can be expected to result in a serious degree of permanent disfigurement.
- An exposure to a hazardous substance in a degree or amount sufficient to create the realistic possibility of death or serious physical harm in the future.
- Major Covid-19 Outbreak (20 or more employee Covid-19 cases in an exposed group, during their infectious period within a 30-day period).

NOTE: Injuries or illnesses that occur on a public street or highway are not required to be reported to Cal/OSHA.

Near Miss: An event with the potential to produce a serious occupational injury, illness, or significant property damage, which may or may not have produced workplace disruption but did not involve a recordable occupational injury or illness. Documentation of all near miss events is required (Appendix A)

Serious injury or illness: Any injury or illness occurring in a place of employment or in connection with any employment which requires inpatient hospitalization except for 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.

PPE: Personal Protective Equipment (PPE) includes hand, foot, and head protection, protective clothing, and other equipment which helps protect the body from various hazards.

6.0 MANAGEMENT COMMITMENT AND THE ASSIGNMENT OF RESPONSIBILITIES

6.1 The Chief Probation Officer (CPO) is responsible for ensuring that an effective IIPP is developed and implemented. The CPO will take whatever actions are needed, within his/her authority, to procure and allocate resources to maintain this program.

- a. Provide leadership to ensure that the IIPP is fully and effectively implemented at all JPD facilities.
- b. Assign the JJC Facilities Director the responsibility of implementing the IIPP within the Juvenile Justice Center.
- c. Assign the Director of Administration for the responsibility of implementing the IIPP within all facilities, including Administration Building, Service Building, and IT Building.
- d. Designate the Superintendent of Building & Grounds as the Occupational Safety & Health (OSH) Coordinator.
- e. Review and approve health and safety policies.
- f. Promote a positive atmosphere of open communication, free from harassment, discrimination, and retaliation.

6.2 The Deputy Director of Administrative Services shall:

- a. Develop and implement a written Emergency Action Plan for the department.
- b. Ensure an effective IIPP is developed and implemented.
- c. Procure and allocate resources to implement and maintain an effective IIPP for the department.
- d. Identify budget requirements with respect to health and safety risks.
- e. Review incident and illness investigation report.
- f. Respond to citations from Cal/OSHA or other organizations.
- g. Will designate members to the Safety Coordination Committee.

6.3 The Human Resources Director shall:

- a. Ensure that worker's compensation forms are available at all JPD facilities.
- b. Complete DWC-1 Form within the same shift and Form 5020 within five days when an occupational injury or illness is reported and notify who takes on this responsibility to conduct injury and illness investigation.
- c. Conduct injury and illness investigation.
- d. Update the status of each worker's compensation claim.
- e. Ensure posting of annual summary of the OSHA 300 Log within the required time frame.
- f. Establish and maintain a Bulletin Board dedicated to health and safety information at a visible location in each building of the facility.
- g. Ensure that a Safety and Health Bulletin Board is established and maintained at each Juvenile Probation Facility. Items posted on the Bulletin Board shall include:
 - Current "Notice of Compensation Carrier."
 - Current Cal/OSHA "Safety and Health Protection on the Job" poster.
 - Annual summary posting of the OSHA 300 Log during the required timeframe.
- h. A copy of the Emergency Action Plan will be provided to all new employees during the onboarding process.

6.4 The OSH Coordinator shall:

- a. Maintain an effective IIPP for Building and Grounds employees.
- b. Coordinate all activities associated with Cal/OSHA inspections and other health and safety inspections.
- c. Provide technical assistance and support for development, implementation, and maintenance of the IIPP.
- d. Conduct hazard assessment and occupational exposure monitoring if needed.
- e. Provide job-specific safety training for designated topics periodically as required per Cal/OSHA to the Building and Grounds employees and maintain training records.
- f. Conduct and document quarterly hazardous material inspection of their work

areas (Appendix B).

6.5 All Supervisors shall:

- a. Maintain an effective IIPP for their work areas.
- b. Provide job-specific safety training for designated topics periodically as required per Cal/OSHA to employees and maintain training records.
- c. Work with the OSH Coordinator as necessary and appropriate to ensure that identified health and safety hazards are corrected in a timely manner.
- d. Review operations periodically to verify that they are being performed safely.
- e. Investigate and respond to safety risks reported by employees.
- f. Consult with the OSH Coordinator for hazard assessment and corrective action plan.
- g. Assure all employees have reviewed the facility's Emergency Action Plan and understand the procedures for employee evacuation in situations where employee health and welfare are endangered.
- h. Coordinate with Human Resources to complete DWC-1 Form within the same shift and Form 5020 within five days.

6.6 All employees shall:

- a. Comply with Cal/OSHA regulations and JPD guidelines and policies.
- b. Observe and follow safety and health rules and procedures that apply to their assignment.
- c. Use and maintain personal protective equipment (PPE) as required for safe job performance.
- d. Promote and facilitate the health and welfare for themselves and others.
- e. Report any potential safety or health risk or occupational injuries and illness to their supervisor immediately, either verbally or in writing and provide supplementary information as requested.
- f. Attend Health & Safety training as required.
- g. Complete Employee Safety Checklist (Appendix C).
- h. Complete Safety Communications Form to document safety suggestions or safety concerns (Appendix D).

6.7 The Juvenile Probation Department has created a Safety Coordination

Committee. The Committee is advisory in nature and coordinates activities with JPD's management team to ensure compliance. The assigned duties of the Committee include the following:

- a. Conduct initial and periodic inspections, initiate hazard abatements, and conduct incident investigations as necessary.
- b. Provide guidance to Managers and Supervisors regarding any required personal protective equipment for employee use.
- c. Review all occupational injury and illness forms as required by Section 6.
- d. Notify OSH Coordinator of Cal/OSHA inspections.
- e. Records of meetings shall be documented using Record of Safety Coordination Committee Meeting Form (Appendix E).

Juvenile Probation Department staff members who have been assigned specific responsibilities are identified in Appendix F. Deputy Director for Administrative Services, OSH Coordinator, Finance Director, HR Director, Training Officer, Member at Large.

7.0 ERGONOMIC ASSESSMENTS

7.1 SCHEDULING THE ERGONOMIC "ERGO" APPOINTMENT

- a. New employees and employees relocating to a different workspace that have job duties primarily involving desk work will be offered an ergo evaluation. It will be scheduled when JPD has a minimum of two (2) employees that require an ergo evaluation; if there is a serious need for an ergo evaluation, an appointment will be scheduled as soon as possible.
- b. Existing employees who are experiencing discomfort may also request an ergo evaluation.
- c. Supervisors or managers may reach out on their employees' behalf if they notice an employee may be experiencing distress.
- d. The Ergo Coordinator ("Coordinator") will contact the employee(s) receiving an ergo evaluation to notify them of scheduling intent and to provide an approximate timeline for their ergo evaluation.
- e. For existing employees, the Coordinator will contact JPD's Workers Compensation (WC) Adjuster to see if there is an existing ergo-related claim for the employee. If there is an ergo-related claim on file, the WC team will contact the employee directly to provide ergo service under their associated WC claim.
- f. For new or existing employees with no ergo-related WC claim on file, the Coordinator will contact the Ergo Assessment Vendor ("Vendor") and confirm

when they are available to conduct the ergo evaluation(s) at 375 Woodside Avenue.

- g. Upon receiving the Vendor's availability, the Coordinator will contact the employee(s) receiving an ergo evaluation to schedule their appointment(s)
- h. Once scheduling is finalized, the Coordinator will contact the Vendor to confirm the final schedule and notify JPD's Senior Budget and Procurement Analyst ("Finance Analyst") that ergo evaluations were scheduled (for billing purposes).

7.2 ERGONOMIC EVALUATION

- a. The Coordinator will provide the Vendor with employee contact information (i.e., email address) so that the Vendor can provide the employees receiving an ergo evaluation with an electronic calendar invitation and documents to complete prior to their appointments.
- b. The Vendor will travel on-site to JPD to conduct the ergo evaluation(s); evaluations are an interactive one-on-one process. A typical ergo evaluation has a duration of approximately 30-45 minutes.
- c. Once the Vendor completes their ergo evaluation(s), they will email the Coordinator with an Ergo Evaluation Report within one week from the evaluation date. The report summarizes the primary segments of the ergo evaluation and highlights any ergo-related issues the employee may need to address. Reports may also include suggestions on making ergo-related adjustments to their work area as well as recommended equipment to be purchased.
 - 1. If the report recommends equipment that is necessary, the Coordinator will contact the Finance Analyst to confirm that appropriate equipment can be selected based on inventory from JPD office supply vendors. Once the necessary equipment is identified, the Coordinator will confirm the selected equipment with the Vendor and later facilitate delivery of the equipment to the employee.
 - 2. If the report recommends equipment that is optional, the Coordinator will contact the Finance Analyst to check if JPD has the equipment on hand/in storage. If JPD does not have inventory of the equipment, the equipment will be ordered if sufficient budget exists and the equipment is available for purchase through JPD office supply vendors. If equipment is ordered or available, the Coordinator will facilitate delivery of the equipment to the employee.
- d. The Coordinator will also provide the Ergo Evaluation Report to the employee for their review and if the employee has any questions, the Coordinator will follow-up with the Vendor as necessary.

7.3 ERGO EQUIPMENT INSTALLATION

- a. The Finance Analyst will purchase any ergo equipment (if necessary) after discussing with the Coordinator based on an employee's Ergo Evaluation Report. If an employee makes a request to order equipment not associated with their ergo evaluation, the employee should submit a requisition using the same JPD process as general office supplies.
- b. Ergo equipment is received by JPD's Storekeeper and provided to the Finance Analyst or delivered directly to the employee. Larger items are generally held by JPD's Building & Grounds ("B&G") Unit until a move date to the employee's office is established.
- c. If any computer-related ergo equipment is purchased for the employee, JPD's Information Technology Unit may be involved in installation. Again, larger items such as tables require delivery and installation by JPD's B&G Unit.

8.0 HAZARD ASSESSMENT

- a. Potential health and safety hazards shall be identified by conducting health & safety assessments in every facility and area where Juvenile Probation employees are assigned. Both scheduled periodic and as-needed assessment shall be completed.
- b. Scheduled Periodic Assessment - The OSH Coordinator will ensure that the Quarterly Self-Inspection for Hazardous Materials is conducted. An increase in frequency may be required where there is an increased number of incidents or identified risks.
- c. As Needed/As Requested Assessment - Assessment will be performed by B&G Unit when new or modified processes, equipment, or substances are introduced. Hazard assessment for new processes, equipment or substances should be reviewed long before implementation, preferably in design or pre-purchase phase, to maximize employee safety and minimize implementation issues.

9.0 ACCIDENT/EXPOSURE INVESTIGATIONS

9.1 Accident Investigation

- a. Investigation of workplace accidents, hazardous substance exposures and near accidents will be done by the Supervisor and Human Resources, and will include:
 - b. Visiting the scene as soon as possible.
 - c. Interviewing affected workers and witnesses.
 - d. Examining the workplace for factors associated with the accident/exposure/near miss.
 - e. Determining the causes of the accident/exposure/near miss.

- f. Develop a corrective action plan to prevent the accident/exposure/near miss from reoccurring.
- g. Complete JPD Incident Investigation Report (Appendix A).

9.2 EXPOSURE MONITORING

For some physical (noise, vibration, radiation, etc.), chemical and biological agents, exposure monitoring may be needed to investigate and quantify a risk. Questions about such agents should be directed to the OSH Coordinator, who shall evaluate the need for monitoring and/or will provide sampling coordination.

10.0 HAZARD CORRECTION

PROCEDURE FOR ABATING HAZARDS

There are two categories of hazards that may be identified during the assessments: work area hazards identified during the walkthrough survey, and program deficiencies identified during the review of the occupational safety and health programs. These hazards will be prioritized for abatement according to the severity of the hazard.

- a. The OSH Coordinator shall initiate hazard abatement for hazards identified during the baseline or periodic assessments. The procedure for hazard abatement is:
 - Immediately cease the hazardous process or stop the use of the hazardous materials.
 - Determine the best way to change the process or to alleviate the hazard.
- b. Interim control measures will be used if permanent control measures cannot be instituted in a timely manner.
- c. When an imminent hazard is identified that cannot be immediately abated without endangering employees, the supervisor will remove exposed personnel from the area, except those necessary to correct the hazard. Such employees will be provided the necessary safeguards. The supervisor shall advise the Human Resources Director of the hazardous situation.
- d. The OSH Coordinator will track all work area hazards identified in the assessments to ensure that all the items are abated in a timely manner.
- e. The OSH Coordinator will document in writing when a hazard is abated. This document will include the interim and permanent control measures. The OSH Coordinator will maintain copies of all records pertaining to hazard abatement.
- f. The OSH Coordinator will coordinate resolution of program deficiencies identified in the baseline hazard assessment survey report and inspections. This will include developing and implementing health and safety programs.

10.1 RISK ASSESSMENT CODES

All hazards will be assigned a risk assessment code based on the hazard severity and mishap probability. The hazards will then be abated according to their assigned priority.

- Code 1: Hazard abatement initiated immediately. Abatement must be completed within 24 hours.
- Code 2: Abatement initiated within 3 business days.
- Code 3: Abatement initiated within 7 business days.
- Code 4: Abatement initiated within 14 business days.
- Code 5: Abatement initiated within 30 calendar days.

Eliminate the hazard immediately, if possible. Manage the hazard by establishing and maintaining healthy communicative work environments and developing and enforcing procedures that clearly state how to perform the job safely.

Limit exposure to the hazard by training personnel to follow prescribed safe work practices and behaviors that limit or avoid the risk.

Protect against the hazard by prescribing personal protective equipment (PPE) for employees.

PPE should be provided only after other strategies (engineering or administrative risk controls) have been implemented and/or exhausted, as required by Ca/OSHA.

The OSH Coordinator will ensure that any hazards identified are corrected in a timely manner.

Risks and other identified deficiencies that require longer-term follow-up will be monitored by B&G until completion/resolution. All such actions taken, and dates completed shall be documented on the attached Identified Hazards and Correction Record (Appendix A).

Interim control measures shall be used if permanent control measures cannot be instituted in a timely manner. If interim control measures are not feasible or if controls do not fully or satisfactorily abate the risk, supervisors shall:

Discontinue the unsafe work practice or task and/or isolate the area until abatement can be completed.

Remove affected personnel from an area if employee health and welfare is endangered.

Management staff will be advised of this situation as needed.

10.2 EMERGENCY RESPONSE

The Juvenile Probation Department has developed and implemented a written Emergency Action Plan that includes the following elements:

- Procedures for emergency evacuation, including type of evacuation and exit route assignments.
- Procedures to be followed by employees who remain to operate critical plant operations before they evacuate.
- Procedures to account for all employees after emergency evacuation has been completed.
- Procedures to be followed by employees performing rescue or medical duties.
- The preferred means of reporting fires and other emergencies; and names or regular job titles of persons or departments who can be contacted for further information or explanation of duties under the plan.

All supervisors shall:

- Review their facility emergency action plan with all employees upon initial employment and at least annually thereafter.
- Remove affected personnel from an area if employee health and welfare is endangered.
- Advise the OSH Coordinator of the of dangerous or deficient situations as needed.

11.0 EMPLOYEE COMMUNICATIONS

Communication between the employer and employee is an essential element of an occupational safety and health program. It provides ongoing opportunities to discuss matters relating to occupational safety and health, including encouraging employees to inform Managers and Supervisors of hazards at the worksite with fear of reprisal. The following methods will be included as part of the IIPP to communicate with employees:

- 11.1 Health & Safety Training (Refer to Section 13).
- 11.2 Safety Meetings: Managers and Supervisors will conduct a minimum of one safety meeting with their employees per calendar quarter. These meetings may be incorporated into regularly scheduled staff meetings. Whenever safety is discussed at a meeting, it should be documented on the training record provided in Appendix E.
- 11.3 Bulletin Board: A bulletin board that contains information regarding employee safety must be maintained in each building of the facility. It is the responsibility of the Safety Coordination Committee, working with the OSH Coordinator, to identify and maintain these bulletin boards. The following items must be posted on each safety bulletin board:
- Cal-OSHA poster “Safety and Health Protection on the Job”
 - Notice of Workers’ Compensation Carrier
 - “Access to Medical and Exposure Records” poster
 - Log and Summary of Occupational Injuries and Illnesses will be posted by February 1 of each year.

12.0 EMPLOYEE COMPLIANCE

JPD will enact all possible measures to ensure employees comply with safe and healthful work practices. A variety of methods will be used to encourage compliance including, but not limited to training programs, and recognition and incentives for employees who follow safe and healthful work practices.

- 12.1 All employees will be provided with the departmental Code of Safe Practices as set forth in this document (Appendix H). Employees will be required to comply with the department Code. Failure to comply may lead to disciplinary action.
- 12.2 Employee Training Programs: All employees will be expected to attend safety and health training programs.
- 12.3 Employees will be encouraged to report any potential safety or health hazards to his/her immediate supervisor, a member of the Safety Coordination Committee, or the OSH Coordinator, as described in Section 6.6 of this plan.

13.0 HEALTH AND SAFETY TRAINING

- 13.1 A copy of the IIPP will be provided to all employees. Special training will be given to Managers and Supervisors to assist them in reinforcing the training of their employees and in responding to incidents or reports of hazardous situations/materials. Training areas will include:
 - Emergency action and fire safety procedures
 - Provisions for medical services and first aid.
 - Medical services and first aid.
 - Proper housekeeping, such as keeping stairways and aisles clear, work areas neat and orderly, and promptly cleaning up spills.
 - Prohibiting horseplay, scuffling, or other acts that tend to adversely influence safety.
 - Proper reporting of hazards and accidents to supervisors.
- 13.2 For the Building and Grounds Division training will be provided when:
 - The employee is first hired.
 - The employee is reassigned to job assignments with new OSH hazards.
 - New substances, process, procedures, or equipment that present a new hazard are brought into the work area.
 - New or previously undiscovered hazards are brought to the employer's attention.

- An employee has not already participated in training in general safe work practices and been given specific instructions with respect to hazards unique to that employee's job assignment.

Training areas will include:

- Prevention of musculoskeletal disorders, including proper lifting techniques.
- Proper storage to prevent stacking goods in an unstable manner and storing goods against doors, exits, fire extinguishing equipment, and electrical panels.

13.3 Safety and Health training must be documented in writing for each employee. Records will be maintained by the Training Coordinator. Appendix G provides a sign-in sheet to document training.

14.0 EMPLOYEE ACCESS TO RECORDS/RECORDKEEPING

14.1 Employee training records shall contain the following information:

- Name of the course
- Date, time, length of the course
- Instructor(s) name(s)
- Summary of course content
- Printed name of the participant (course roster)
- Signature of the participant (course sign-in sheet)
- Job classification of the employee

14.2 Employees have the right to access health and safety records. Records may be obtained upon request.

- The OSH Coordinator shall maintain the following records:
- Periodic self-inspection for hazardous materials facilities
- Safety training and meeting records of Building and Grounds employee
- Inspection reports from the Department of Public Health (DPH), the Department of Public Works (DPW), Cal/OSHA, etc.
- Occupational and environmental exposure monitoring data
- Identified hazards and correction records
- Inspection reports from DPH, DPW, Cal/OSHA, etc.

14.3 Record Keeping:

- Workers' compensation claims
- Supervisors shall maintain the following records:
- Job-specific safety and meeting records
- JPD Injury and Illness Investigation Reports
- Ergonomic assessment report

14.4 Training records will be maintained by the Training Coordinator.

14.5 Supervisors shall maintain the following records:

- Job-specific safety and meeting records

15.0 REPORTING PROCEDURES FOR INJURIES, ILLNESSES, INCIDENTS, EXPOSURES, OR NEAR MISSES

15.1 Reporting injuries, illnesses, incidents, or exposures requiring medical care:

- a. It is the employee's responsibility to notify the supervisor of on-the-job injuries and illnesses.

15.2 When an employee's injury, illness, or exposure results in the need for medical care (beyond first aid) and/or results in lost time from work, the supervisor must complete the following forms within the time periods described for each form:

- **State of California Employee's Claim for Workers' Compensation Benefits – DWC-1**

Within one day of knowing an employee became hurt or ill because of work, the supervisor shall provide the employee with an "Employees Claim for Workers' Compensation Benefits" (DWC-1 claim form). The employee must fill out this form and give it back to the employer. The supervisor shall then complete the employer's portion of the form and provide it to the Departmental Personnel Officer (DPO), with a signed and dated copy to the employee within one working day of the date the completed form was received from the employee.

If the employee is not at work to complete the form, the DPO will send the form via certified U.S. mail, within one day of knowledge of the injury, to the employee's home to be completed. The employee should complete the form and return it to the DPO. The supervisor must then complete the employer portion and return a signed and dated copy of the form to the employee.

Supervisors should not complete the employee's portion of the form under any circumstances.

- **State of California "Employer's Report of Occupational Injury or Illness" – DLSR form 5020.**

The supervisor or DPO must then complete the "Employer's Report of Occupational Injury or Illness" (DLSR form 5020) and provide this form to the Workers' Compensation claims administrator.

- **Incident Investigation Report**

The manager or Supervisor shall conduct an investigation and complete an **Incident Investigation Report** (Appendix A) and submit the completed form to the DPO within 24 hours of being notified by the employee of the incident.

15.3 When an employee reports an injury (beyond first aid), illness, incident, exposure,

or near miss that does not result in the need for medical care and/or time lost from work, the Manager or Supervisor must complete an investigation and complete an **Incident Investigation Report**. The completed form must be submitted to the DPO within 24 hours of being notified by the employee of the incident.

- a. When an injury requiring medical attention is reported, the supervisor shall immediately determine the appropriate medical facility for treatment. The Supervisor should arrange for transportation for the employee to seek non-emergency medical care if necessary.
 - For emergency medical care:
In case of serious or severe injury, dial 911 (or **9-911** when calling from JPD) for an emergency response to transport an employee to the appropriate emergency center.
 - For **non-emergency medical care** of employees who have not designated a personal physician:

The supervisor shall direct the employee to seek treatment from CCSF- designated medical provider:

Kaiser Occupational Health Clinic (Opera Plaza)
601 Van Ness Avenue, Suite 2008
(Corner of Van Ness & McAllister, 2nd Floor)
Hours: 8:30am to 5:00pm, Monday-Friday
Telephone: (415) 674-7000

Saint Francis Memorial Hospital Emergency Department
1100 Bush Street (between Hyde and Leavenworth Streets)
Telephone: (415) 353-6300

Should a work-related injury or illness occur outside normal work hours, the following medical Facilities have been designated for treatment:

California Pacific Medical Center
Davies Campus Emergency Department
Castro & Duboce Streets
Telephone: (415) 600-0600

Kaiser Permanente Urgent Care Clinic
2238 Geary Blvd., 8th Floor, S.E.
Hours: 5:00pm to 9:00pm
Telephone: (415) 833-2000

Kaiser Permanente Emergency Department
2200 O'Farrell Street at Baker
Hours: 9:00pm to 8:00am
Telephone: (415) 202-2000

Employees may be treated for a workplace injury or illness by their personal medical doctor (M.D.), Doctor of osteopathic medicine (D.O.), or medical group if:

- The doctor is the employee's regular physician, had previously directed the employee's medical treatment and retains the employee's medical records;
- The employee's "personal physician" may be a medical group if it is a single corporation or partnership composed of licensed doctors or medicine or osteopathy, which operates an integrated multispecialty medical group providing comprehensive medical services predominantly for non-occupational illnesses and injuries;
- Prior to the injury, the employee's doctor agreed to treat him/her for work injuries or illnesses;
- Prior to the injury, the employee provided the employer the following in writing:
 1. Notice that the employee wants his/her personal doctor to treat work-related injury or illness, and
 2. The employee's personal doctor's name and business address.The form for pre-designated a personal physician can be found on the [forms page](https://sfdhr.org/forms-and-documents) of the <https://sfdhr.org/forms-and-documents>.

16.0 CAL/OSHA INSPECTIONS AND CITATIONS

Upon awareness of a Cal/OSHA inspector on the premises, the receptionist shall notify the OSH Coordinator, Director, or Deputy Director of Administration. The OSH coordinator, or Deputy Director for Administrative Services will accompany the Cal/OSHA inspector, providing records as necessary.

Appendix A INCIDENT INVESTIGATION REPORT

Instructions: Supervisors must complete this form as soon as possible but no later than 24 hours after the incident. The accuracy of this report is essential for Workers' Compensation and OSHA reporting. The completed report must be submitted to the OSH Coordinator @ 1 S. Van Ness, 4th Floor.

NATURE OF INCIDENT: Please check all that apply.

<input type="checkbox"/>	Injury or Illness resulting in the need for medical treatment
<input type="checkbox"/>	Injury or Illness not resulting in the need for medical treatment
<input type="checkbox"/>	Exposure not resulting in the need for medical treatment – for documentation only
<input type="checkbox"/>	Near Miss with potential for injury or illness
<input type="checkbox"/>	Property damage with no injury or illness
<input type="checkbox"/>	Fatality
<input type="checkbox"/>	Other – Please explain: _____

Employee Name: _____ Today's Date: _____

Job Code: _____ Job Code Title: _____

Division: _____ Time employee began work: _____

Date of incident: _____ Time of Incident: _____

Date first reported: _____ Time reported: _____

Person reporting incident if other than injured employee: _____

Was the incident on City & County property? Yes No

Location of the incident (please be specific): _____

Name of witnesses (attach witness statements if applicable)

(a): _____ (b): _____

What specific activity was the employee performing when the incident occurred? _____

Explain the incident in detail, (how it occurred, sequence of events, nature of the injury) _____

Did the employee report an injury or illness? Yes No

Did the employee miss any work as a result of the injury or illness? Yes No

If yes, number of days missed: _____ Date last worked: _____

Date employee was scheduled to work next? _____

If the employee reported an injury or illness, please identify the nature of the injury or illness.
(Check all that apply)

	Abrasion, Scratch		Flashburn (eyes)
	Amputation		Foreign Body (eye or other)
	Blow to Head		Foreign Body: other wound
	Broken Bones (including teeth)		Heatstroke, Heat Exhaustion
	Bruise		Hernia, Rupture
	Burn 1 st 2 nd 3 rd degree		Multiple Injuries (describe in comments)
	Cut, Puncture		Respiratory Problems
	Electric Shock		Skin Rash
	Exposure to Body Fluids		Sprain, Strain, Dislocation
	Eye Irritation		Other, (describe in comments)

Comments: _____

Please identify the part(s) of the body affected by the injury or illness.
 (Check all that apply)

	Head, not face, eyes, inner ear		Ear(s) including hearing
	Eyes		Face, including nose, mouth, teeth
	Neck		Shoulder(s)
	Upper Arm(s) including elbow		Forearm(s) including wrist(s)
	Hand(s) or Finger(s)		Abdomen including internal organs
	Upper Back, muscles, spine, cord		Lower Back, muscles, spine, cord
	Chest, including ribs and internal organs		Hips, including pelvis, buttocks, etc
	Upper Leg(s) including knee(s)		Lower Leg(s) including ankle(s)
	Foot and/or toe(s)		Circulatory System
	Respiratory System		Other, (describe in comments)

Comments: _____

Was any third party (Non-City employee) responsible or involved in the incident? Yes No

If yes, please explain in detail _____

Was an investigation of the incident conducted: Yes No *

If yes, please identify any corrective actions taken to prevent recurrence of the incident due to the continued existence of the hazard, and those actions needed to fully resolve the hazard.

Corrective Action	Scheduled Completion	Date Completed
1.		
2.		
3.		
4.		
5.		

Additional Comments: _____

* Provide detailed comments regarding why an investigation was not conducted: _____

Prepared by:

Print Name: _____ Date: _____
 Signature: _____ Phone: _____

For DPO use only	Date received: _____	Date to TPA: _____	Follow-up required: _____
Comment:			

SELF-INSPECTION CHECK LIST

Appendix B

LOCATION: _____ **DATE:** _____

SECTION	ITEM	YES	NO	PRIORITY	DATE ABATED
I EMPLOYER POSTING					
a	Is the CAL/OSHA Poster "Safety and Health Protection on the Job" displayed in a prominent location where all employees are likely to see it?				
b	Are emergency telephone numbers posted where they can be readily found in case of emergency?				
c	Where employees may be exposed to any toxic substances or harmful physical agents, has appropriate information concerning employee access to medical and exposure records, and "Material Safety Data Sheets", etc., been posted or otherwise made readily available to affected employees?				
d	Are signs concerning "Exiting from buildings" posted where appropriate?				
	Are other California posters properly displayed, such as:				
e	Industrial Welfare Commission orders regulating wages, hours, and working conditions?				
f	Discrimination in employment prohibited by law?				
g	Notice to employees of unemployment and disability insurance?				
h	Payday Notice?				
i	Summary of occupational injuries and illnesses posted in the month of February?				
II RECORDKEEPING					
a	Are all occupational injury or illnesses, except minor injuries requiring only first aid, being recorded as required on the Cal/OSHA Form 300?				
b	Are employee medical records and records of employee exposure to hazardous substances or harmful physical agents up-to-date?				
c	Have arrangements been made to maintain required records for the legal period of time for each specific type record?				
III SAFETY AND HEALTH PROGRAM					
a	Do you have an active safety and health program in operation?				
b	Is one person clearly responsible for the overall activities of the safety and health program?				
c	Do you have a safety committee or group that meets regularly and reports in writing on its activities?				
d	Do you have a working procedure for handling in-house employee complaints regarding safety and health?				
e	Are you keeping your employees advised of the successful effort and accomplishments the safety committee have made in assuring they will have a workplace that is safe and healthful?				
IV MEDICAL SERVICES AND FIRST AID					
a	Do you require each employee to have a pre-employment physical examination?				
b	Is there a hospital, clinic, or infirmary for medical care in proximity of your workplace?				
c	Is there at least one employee in each area currently qualified to render first aid (NOT first responder)?				

SELF-INSPECTION CHECK LIST

SECTION	ITEM	YES	NO	PRIORITY	DATE ABATED
IV MEDICAL SERVICES AND FIRST AID					
d	Are medical personnel readily available for advice and consultation on matters of employees' health?				
e	Are emergency phone numbers posted?				
f	Are first aid kits easily accessible to each work area, with necessary supplies available, periodically inspected and replenished as needed?				
g	Are means provided for quick drenching or flushing of the eyes and body in areas where corrosive liquids or materials are handled?				
V FIRE PROTECTION					
a	Is your local fire department well acquainted with your facilities, its location and specific hazards?				
b	Is the fire alarm system certified as required?				
c	Is the fire alarm system tested at least annually?				
d	Are interior stand pipes and valves inspected regularly?				
e	Are automatic sprinkler system water control valves, air and water pressures checked periodically as required?				
f	Are sprinkler heads protected by metal guards when exposed to physical damage?				
g	Are portable fire extinguishers provided in adequate number and type?				
h	Are fire extinguishers mounted in readily accessible locations?				
i	Are fire extinguishers recharged regularly and noted on the inspection tag?				
j	Are employees periodically instructed in the use of extinguishers and fire protection procedures?				
VI HAZARDOUS CHEMICAL EXPOSURES					
a	Are employees trained in the safe handling practices of hazardous chemicals such as acids, caustics, etc.?				
b	Are employees aware of the potential hazards involving various chemicals stored or used in the workplace such as acids, bases, caustics, etc.?				
c	Is employee exposure to chemicals kept within acceptable levels?				
d	Are flammable or toxic chemicals kept in closed containers when not in use?				
e	Have standard operating procedures been established and are they being followed when cleaning up chemical spills?				
f	Is personal protective equipment provided, used and maintained whenever necessary?				
VII HAZARDOUS SUBSTANCES COMMUNICATION					
a	Is there a list of hazardous substances used in your workplace?				
b	Is there a written hazard communication program dealing with Material Safety Data Sheets (MSDS), labeling, and employee training?				
c	Is each container for hazardous substance labeled with product identity and a hazard warning (communication of the specific health hazards and physical hazards)?				
d	Is there a Material Safety Data Sheet (MSDS) readily available for each hazardous substance used?				

SELF-INSPECTION CHECK LIST

SECTION	ITEM	YES	NO	PRIORITY	DATE ABATED
VIII ELECTRICAL					
a	Are all employees required to report as soon as practicable any obvious hazard to life or property observed in connection with electrical equipment or lines?				
b	Do extension cords being used have a grounding conductor?				
c	Are multiple plug adaptors prohibited?				
IX NOISE					
a	Are there areas in the workplace where continuous noise levels exceed 85dBA?				
b	Have work areas where noise levels make voice communication between employees difficult been identified and posted?				
c	Is approved hearing protective equipment (noise attenuating devices) available to every employee working in noisy areas?				
d	Is there an ongoing preventive health program to educate employees in: safe levels of noise, exposures; effects of noise on their health; and the use of personal protection?				
X PORTABLE LADDERS					
a	Are all ladders maintained in good condition, joints between steps and side rails tight, all hardware and fittings securely attached and movable parts operating freely without binding or undue play?				
b	Are non-slip safety feet provided?				
c	Are ladder rungs and steps free of grease and oil?				
d	Are employees instructed to face the ladder when ascending or descending?				
XI MISCELLANEOUS					
a	Are hand trucks maintained in safe operating condition?				
b	Do employees who operate vehicles on public thoroughfares have valid operator's licenses?				
c	When lunches are eaten on the premises, are they eaten in areas where there is no exposure to toxic materials or other health hazards?				
WORK AREA SAFETY CHECKLIST					
XII GENERAL WORK ENVIRONMENT					
a	Are all worksites clean and orderly?				
b	Are work surfaces kept dry or appropriate means taken to assure the surfaces are slip-resistant?				
c	Are all spilled materials or liquids cleaned up immediately?				
d	Are the minimum number of toilets and washing facilities provided?				
e	Are all toilets and washing facilities clean and sanitary?				
f	Are all work areas adequately illuminated?				
XIII EXITING or EGRESS					
a	Are all exits marked with an exit sign and illuminated by a reliable light source?				
b	Are the directions to exits, when not immediately apparent, marked with visible signs?				
c	Are doors, passageways or stairways that are neither exits nor access to exits and which could be mistaken for exits, appropriate marked "NOT AN EXIT"?				

SELF-INSPECTION CHECK LIST

SECTION	ITEM	YES	NO	PRIORITY	DATE ABATED
XIII EXITING or EGRESS					
d	Are exit signs provided with the word "EXIT" in lettering at least 5 inches high and the stroke of the lettering at least ½-inch wide?				
e	Are exit doors side-hinged?				
f	Are all exits kept free of obstructions?				
g	Are at least two means of egress provided from rooms where the absence of a second exit would increase the risk of injury from hot, poisonous, corrosive, suffocating, flammable, or explosive substances?				
h	Are there sufficient exits to permit prompt escape in case of emergency?				
i	Is the number of exits from the building appropriate for the building occupancy load?				
XIV EXIT DOORS					
a	Are doors that are required to serve as exits designed and constructed so that the way of exit travel is obvious and direct?				
b	Are exit doors openable from the direction of exit travel without the use of a key or any special knowledge or effort when the building is occupied?				
c	Where panic hardware is installed on a required exit door, will it allow the door to open by applying a force of 15 pounds or less in the direction of the exit traffic?				
XV WALKWAYS					
a	Are aisles and passageways kept clear?				
b	Are wet surfaces covered with non-slip materials?				
c	Are spilled materials cleaned up immediately?				
XVI FLOOR AND WALL OPENINGS					
a	Are skylight screens of such construction and mounting that they will withstand a load of at least 200 pounds?				
b	Is the glass in windows, doors, glass walls, etc., which are subject to human impact of sufficient thickness and type for the condition of use?				

Priority: 1: immediate 2: within 48 hours 3: within one week 4: abatement plan required

COMMENTS: _____

 (Print Name) Inspection Performed By Signature

 (Print Name) Inspection Performed By Signature

 (Print Name) Inspection Performed By Signature

INJURY AND ILLNESS PREVENTION PROGRAM

Appendix C

EMPLOYEE SAFETY CHECK LIST

(This form is to be completed within two days of the employee's start work date.)

 Print Employee Name – First, Middle, Last Classification Number and Title

 Division and Unit to Which Assigned Start Work Date

These items must be discussed with the employee, and comments made where necessary.

✓	Item	Comments
	1 JPD IIPP	
	2 Code of Safe Practices	
	3 Safety Rules (specific to the job assignment)	
	4 Safety Rule Enforcement Procedures	
	5 Proper Use of Equipment	
	6 Procedure for Reporting Safety Problems	
	7 Procedure for Reporting Injuries	
	8 City Policy on Medical Treatment	
	9 Emergency Procedures	
	10 Fire Safety	
	11 Importance of Work Area Cleanliness	
	12 Employee Responsibility for Safety	

Additional Comments: _____

By signing, the employee acknowledges that s/he has received a copy of the Code of Safe Practices, has been told about and understands his/her responsibility for safety in the workplace, and agrees to follow the guidelines and procedures as outlined in the IIPP.

 Employee Signature Date of Conference

 Reviewer's Name and Title Reviewer's Signature

Appendix D

EMPLOYEE SAFETY COMMUNICATION FORM

This form is for use by employees who wish to provide a safety suggestion or to report an unsafe workplace condition or practice. While anonymity is an option, if you are suggesting a new procedure, etc., it would be helpful to know with whom to speak if there are questions or clarification is needed. Use of this form is protected by law – it is illegal for the employer to take any action against an employee in reprisal for exercising his/her rights to participate in communications involving safety. Please use the back or attach additional sheets if necessary.

The Safety Coordination Committee will investigate any report of unsafe conditions or practices, or explore any suggestions for new safety procedures or actions, as required by the Injury and Illness Prevention Program, and advise employees of the employer's response.

REASON FOR USE OF FORM: Safety Suggestion Safety Concern

Description of Unsafe Condition or Practice, or Suggestion:

Cause(s) or Other Contributing Factors:

Employee's Suggestion for Improving Safety:

Has this matter been reported to your supervisor? Yes No

Employee Name: _____ Date: _____

Division and Unit: _____

(For Safety Coordination Committee Use Only)

Recommended Action: _____

Action Taken: _____

Signature of Safety Coordination Committee Member Date

Signature of OSH Coordinator

Appendix E

RECORD OF SAFETY COORDINATION COMMITTEE MEETING

Safety Meetings must be documented in order to satisfy Cal/OSHA requirements as outlined in the Injury and Illness Prevention Plan. Documentation is maintained by the OSH Coordinator for the department. Meetings are delivered by the Safety Coordination Committee, either in response to a request from an employee or because the Safety Coordination Committee member determines that a meeting is necessary. These meetings are informal, casual, and may occur at any time. They usually will last from five to fifteen minutes.

MEETING TOPIC: _____

MEETING DATE: _____ **SAFETY COMMITTEE MEMBER:** _____

DIVISION/UNIT: _____

INDICATE EMPLOYEES WHO PARTICIPATED IN THE MEETING:

	NAME
1	
2	
3	
4	
5	
6	
7	
8	
9	
10	

COMMENTS: _____

INJURY AND ILLNESS PREVENTION PROGRAM

Appendix F

STAFF MEMBERS WITH SPECIFIC IIPP RESPONSIBILITIES

**Steve Arcelona
Deputy Director, Administration**

**Kingman Ma
Superintendent, Building & Grounds/OSH Coordinator**

**Preston Treichel
Director, Human Resources**

**Veronica Martinez
Director, Finance**

**TBD
Training Coordinator**

**Member at Large
Safety Coordination Committee Member**

**Member at Large
Safety Coordination Committee Member**

Appendix G

RECORD OF SAFETY TRAINING SESSION

Safety Training must be documented in order to satisfy Cal/OSHA requirements as outlined in the Injury and Illness Prevention Plan. Documentation is maintained by the OSH Coordinator for the department. Training is delivered by the OSH Coordinator, the Safety Coordination Committee, or a designee who has expertise in the subject matter.

TRAINING TOPIC: _____

TRAINING DATE: _____ **TRAINER:** _____

ATTENDEES (please **PRINT** your name, your division/unit, and your telephone number):

	NAME	DIVISION/UNIT	TELEPHONE
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			
16			
17			
18			
19			
20			

COMMENTS BY TRAINER:

INJURY AND ILLNESS PREVENTION PROGRAM

Appendix H**CODE OF SAFE PRACTICES**

It is the policy of the Juvenile Probation Department that everything possible will be done to protect employees, customers and visitors from accidents. Safety is a cooperative undertaking requiring participation by every employee. Failure by any employee to comply with safety rules will be grounds for corrective discipline. Supervisors shall insist that employees observe safety rules and practices and take action as necessary to obtain compliance. To carry out this policy, employees shall carry out each of the following steps.

1. Report all unsafe conditions and equipment to your supervisor or safety committee member.
2. Report all accidents, injuries and illnesses to your supervisor or safety committee member.
3. Means of egress shall be kept unblocked, well lighted and unlocked during work hours.
4. Exit doors must comply with fire safety regulations during business hours.
5. In the event of fire, sound the alarm and evacuate.
6. Upon hearing the fire alarm, stop work and proceed to the nearest clear exit. Gather at the designated location.
7. Only trained workers may attempt to respond to a fire or other emergency.
8. Stairways should be kept clear of items that can be tripped over. All areas under stairways that are egress routes must not be used to store combustibles.
9. Materials and equipment will NOT be stored against doors or exits, fire ladders or fire extinguisher stations.
10. Aisles must be kept clear at all times.
11. Work areas should be maintained in a neat, orderly manner; trash and refuse are to be thrown into proper waste containers.
12. All spills shall be wiped up promptly.
13. Storage of files and supplies should be maintained in such a manner as to preclude damage to the supplies or injury to personnel when moving from storage. Heaviest items should be stored closest to the floor and lightweight items stored overhead.
14. Employees should use appropriate step-stools for accessing high places. Do NOT use a wheeled or folding chair to stand on.
15. All cords running into walk areas must be taped down or inserted through rubber protectors to preclude them from becoming tripping hazards.
16. Never stack material precariously on top of lockers, file cabinets or other relatively high places.

INJURY AND ILLNESS PREVENTION PROGRAM

17. Never leave lower desk or cabinet drawers open that present a tripping hazard. Use care when opening and closing drawers to avoid pinching fingers.
18. Do not open more than one upper drawer at a time, particularly the top two drawers on tall file cabinets, or the cabinet may fall over.
19. Always use the proper lifting technique (lift with your knees, not your back). Never attempt to lift or push an object which is too heavy; you must contact a supervisor when help is needed to move a heavy object.
20. When carrying material, caution should be exercised in watching for and avoiding obstructions, loose material, etc.
21. All electrical equipment should be plugged into appropriate wall receptacles or into an extension of only one cord of similar size and capacity. Three-pronged plugs should be used to ensure continuity of grounding.
22. Individual heaters at work areas should be kept clear of combustible materials such as drapes or waste from wastebaskets. Newer heaters which are equipped with tip-over switches should be used.
23. Appliances such as coffee pots and microwaves should be kept in the employees' lounge. They should be kept in working order and inspected for signs of wear, heat or fraying of cords.
24. Fans used in work areas should be guarded. Guards must not allow fingers to be inserted through the mesh. Newer fans are equipped with proper guards.
25. Equipment such as scissors, staples, etc., should be used for their intended purposes only and should not be misused as hammers, pry bars, screwdrivers, etc. Misuse can cause damage to the equipment and injury to the user.
26. Cleaning supplies should be stored away from edible items on kitchen shelves.
27. Cleaning solvents and flammable liquids should be stored in appropriate containers.
28. Solutions that may be poisonous or not intended for consumption should be kept in well-labeled containers and stored in specific locations.
29. Employees who work with hazardous materials must know the location of the Material Safety Data Sheets for such materials.
30. Above all, employees should use common sense in the work place.

I have read and understand all of the above safe practices, and will apply them to my job with the Juvenile Probation Department.

 PRINT NAME OF EMPLOYEE

 UNIT

 SIGNATURE OF EMPLOYEE

 DATE

INJURY AND ILLNESS PREVENTION PROGRAM

Appendix I**EMPLOYEE COMPLIANCE****I EXPECTATIONS**

- A. Each employee is required to go over the Safety Checklist as a part of new-employee orientation.
- B. Each employee is required to read and acknowledge that s/he has read, understood, and intends to comply with the Code of Safe Practices.
- C. Each employee is expected to utilize the Employee Safety Communication Form to suggest safety ideas or to report unsafe practices.

II INCIDENT INVESTIGATION

An incident is an occurrence that affects the safety and/or health of employees, or which prevents employees from performing their normal duties. When an incident occurs, the supervisor in the affected area will initiate an investigation.

- A. Supervisor will obtain reports from employee(s) and any witnesses to the incident.
- B. Supervisor will complete the incident report, following the guidelines for doing so, and forward it to the OSH Coordinator.
- C. Supervisor will forward a copy of the incident report to the Safety Coordination Committee.

III DISCIPLINE

- A. The OSH Coordinator is responsible for determining the level of discipline to be imposed on the employee(s), based upon the severity or frequency of the incident.
- B. The OSH Coordinator will meet with the employee(s) and the supervisor in order to determine level of culpability and appropriate discipline. Disciplinary action may be:
 - 1. Oral warning
 - 2. Written warning
 - 3. Suspension
 - 4. Termination
- C. In all cases, the incident report will be included in the employee's personnel file.
- D. In all cases, an incident requires retraining of the employee(s) involved in the area in which the incident occurred.

IV SAFETY COORDINATION COMMITTEE ACTION

- A. Safety Coordination Committee will review all incident reports filed in order to:
 - 1. determine if changes in training are necessary;
 - 2. determine if changes in procedures are necessary;
 - 3. determine if changes in safety meetings are necessary.