




PORT SAFETY PROGRAM
(INJURY AND ILLNESS PREVENTION PROGRAM)

Management Policy Statement

Employee health and safety is among the Port of San Francisco's highest priorities. Health and safety must be a primary part of all Port work activities, and all employees – at all levels of our organization – have an important role in ensuring employee safety.

The Port will implement the measures outlined in this Safety Program to minimize the risks and number of injuries and illnesses associated with the Port's properties and work activities. This Safety Program complies with all federal, state and local regulations, and details requirements regarding:

- Each Port employee's roles and responsibilities in implementing the Safety Program
- Identifying and reporting hazards, including safety inspections and investigating accidents and near misses
- Mitigating hazardous conditions using the most effective available means
- Developing and implementing safety policies and procedures
- Training employees effectively regarding necessary safety practices
- Enforcing safety requirements, including positive recognition for good safety performance and appropriate personnel action for violating safety rules
- Maintaining open communication regarding safety matters at all times, including through safety meetings, effective trainings and reporting of safety concerns



Executive Director

10/7/2019

Date

TABLE OF CONTENTS

<u>MANAGEMENT POLICY STATEMENT</u>	1
1. PURPOSE	3
2. RESPONSIBILITY	3
3. HAZARD ASSESSMENT	5
4. HAZARD CORRECTION	5
5. COMMUNICATION	7
6. CODES OF SAFE PRACTICES	9
7. INCIDENT INVESTIGATION	9
8. EMPLOYEE COMPLIANCE	10
9. TRAINING AND INSTRUCTION	11
10. RECORD KEEPING	12
APPENDIX A: PORT HEALTH AND SAFETY STAFF	13

Note Regarding Forms:

Throughout this document, reference is made to forms used to collect Port Safety Program mandated information. As forms are periodically changed, the forms are not included in this document. Current forms are available on Portweb (the Port Intranet site), in the Supervisor’s Health and Safety Handbooks (“Redbooks”), and from Port Health & Safety staff.

1. PURPOSE

To establish, implement and maintain an effective Safety Program (Injury and Illness Prevention Program) for the Port of San Francisco, in compliance with California Occupational Safety and Health Standards, Title 8, California Code of Regulations (CCR), Sections 3203 and 1509.2.

2. RESPONSIBILITY

- 2.1 The Executive Director of the Port of San Francisco is responsible for ensuring that an active and effective Safety Program is maintained by allocating adequate resources and ensuring that the various duties required in the Program are supported and fulfilled.
- 2.2 Deputy Directors, the Chief Harbor Engineer, Assistant Deputy Directors and Maintenance Superintendents shall perform, at a minimum, the following duties:
 - 2.2.1 Ensure that open communication regarding safety matters is maintained.
 - 2.2.2 Ensure that periodic health and safety inspections are completed for the areas under their control and that appropriate actions are taken for identified hazards (see Section 3 Hazard Assessment and Section 4 Hazard Correction)
 - 2.2.3 Review open employee safety work orders and Supervisor Incident Investigation Reports for areas under their control and initiate corrective action where needed.
 - 2.2.4 Ensure that employees are provided with the training required under the Safety Program (see Section 5 Communication and Section 9 Training and Instruction).
 - 2.2.5 Develop, maintain and implement safety policies and procedures, with the support of Port Health and Safety staff as needed for work which is under their management.
 - 2.2.6 Evaluate supervisors on the effectiveness of their safety efforts.
 - 2.2.7 Support supervisors under their management in recognizing/positively reinforcing good safety performance among their employees, and in taking appropriate personnel action for employees violating safety requirements.
 - 2.2.8 Make safety and health a regular agenda item at staff meetings (Section 5.3 Safety Meetings).
 - 2.2.9 Maintain a budget for health and safety expenditures.
- 2.3 Port Health & Safety staff shall perform, at a minimum, the following duties:
 - 2.3.1 Support all levels of the Port organization as needed in implementing

this Safety Program.

2.3.2 Maintain all records required by the Safety Program pursuant to the California Code of Regulations, Title 8, Section 3203 and workers' compensation laws. This includes the following:

- Annually posting the OSHA Form 300A, Summary of Work-Related Injuries and Illnesses, and all other required health and safety postings in a conspicuous location.
- Maintaining documentation of the periodic health and safety inspections.
- Maintaining copies of incident investigations and worker's compensation records.
- Maintaining health and safety training records

2.3.2 Review incident investigations and support additional follow-up, where necessary.

2.3.3 Directly support the development and implementation of Port health and safety policies and procedures.

2.3.4 Notify the applicable Deputy Director and the Executive Director of:

- Cal/OSHA inspections
- Serious injuries
- Imminent hazards
- Significant incidents, as warranted.

2.4 Managers and Supervisors shall perform the following duties:

2.4.1 Implement the Safety Program within their work area. This includes conducting or coordinating health and safety training, conducting health and safety inspections, initiating hazard abatement, conducting incident investigations, and ensuring that employees follow health and safety procedures.

2.4.2 Provide job instruction and a review of safety rules and procedures for new employees.

2.4.3 Provide employees with appropriate safety equipment, including personal protective equipment; require its use and proper maintenance.

2.4.4 Enforce health and safety rules that apply to assigned operations.

2.4.5 Immediately notify Port Health & Safety staff if Cal/OSHA requests an inspection or if a serious injury occurs.

2.4.6 Ensure that open communication regarding safety matters is maintained.

2.4.7 Recognize/positively reinforce good safety performance among employees and taking appropriate personnel action when needed for employees violating safety requirements.

2.4.8 Notify the applicable Deputy Director, Superintendent and/or Port Health and Safety of:

- Cal/OSHA inspections
- Serious injuries

- Imminent hazards
 - Significant incidents, as warranted.
- 2.5 All Port employees are required to comply with Cal/OSHA regulations, to observe health and safety rules and procedures that apply to their assignment, and to help identify potential health and safety hazards. Responsibilities include the following:
- 2.5.1 Use all required safety equipment, including personal protective equipment, when required, and follow all the Port safe work practices set forth in Port policies and procedures, including the Port Personnel Policy and Procedures Manual and the Port Codes of Safe Practices.
 - 2.5.2 Report any potential safety or health hazard(s) to his/her supervisor, or through the procedure described in Section 5.6 Procedure for Employees to Report Unsafety and Unhealthy Work Conditions.
 - 2.5.3 Ask for assistance when he/she does not fully understand the safe way to do his/her job.
 - 2.5.4 Encourage other employees to work safely.
 - 2.5.5 Do not undertake any task, use any tool, or operate equipment unless trained and authorized to do so by his/her supervisor.
 - 2.5.6 Report all occupational injuries and illnesses to his/her supervisor.
 - 2.5.7 Participate in required safety and health training.
 - 2.5.8 Participate in medical monitoring examinations, if required based on job duties.

3. HAZARD ASSESSMENT

Safety and health inspections of every work site within the Port of San Francisco will be conducted to identify and evaluate any potential health and safety hazards. The following types of inspections will be conducted:

- 3.1 Periodic Inspections - Deputy Directors will be responsible for ensuring that periodic safety inspections are conducted for all areas under their control.
 - 3.1.1 Periodic inspections are completed annually for all Divisions, except Maintenance. Because of the more dynamic nature of the Maintenance areas, Maintenance supervisors must complete inspections every 6 months.
 - 3.1.2 When inspections are required, Port Health & Safety staff will distribute the necessary health and safety inspection checklists to the Deputy Directors, or his/her designated alternate.
 - 3.1.3 The Deputy Director shall ensure that periodic inspections are completed and properly documented, and hazards are corrected in a timely manner.

- 3.2 As Needed/As Requested Inspections – As required by regulation, inspections will be performed to identify hazards and necessary controls associated with tasks, processes, equipment, and/or substances. This inspection must be documented and the records maintained. The following information will be included in the documentation, if relevant:
- Description of tasks, processes, equipment, and/or substances; including description of each step involved with specific work processes and/or tasks.
 - Description of hazards associated with tasks, processes, equipment, and/or substances.
 - Description of hazard corrections for each hazard.

4. HAZARD CORRECTION

The information on hazard correction will apply to all identified hazards. The hazards may be identified through periodic inspections, as needed inspections, as requested inspections, or through employee safety suggestion. Hazards will be abated according to the following procedure:

- 4.1 All Port employees have the duty and the right to suspend work until corrective measures can be taken when there is a hazard which could reasonably be expected to cause death or serious physical harm. The following steps should be taken when an imminent hazard is identified:
- 4.1.1 Work shall be immediately suspended and exposed personnel shall be removed from the area.
 - 4.1.2 The employee identifying the imminent hazard condition shall notify his/her supervisor, who must in turn notify Port Health & Safety staff and the Deputy Director whose division has responsibility for the hazardous situation or condition.
 - 4.1.3 Employees shall not be permitted to remain in or re-enter an area with an imminent hazard condition except to the degree necessary to correct the condition. Such employees must be provided with necessary safeguards and equipment to protect them from harm.
 - 4.1.4 In cases of dispute as to whether a condition represents an imminent hazard, work shall be suspended until a representative of the Port Health & Safety makes a determination.
- 4.2 The first line supervisor shall initiate hazard abatement for identified hazards as soon as possible, according to the following “hierarchy of controls”, listed in order from controls providing the greatest assurance of hazard mitigation, to controls which may be necessary and effective, but present increasing implementation challenges:
- 4.2.1 Eliminate the source of the hazard.

- 4.2.2 Substitute the task, machine, process or material for a less hazardous version.
 - 4.2.3 Provide engineered guard or other engineered means of isolating the hazard from employees.
 - 4.2.4 Abate the hazard by limiting the exposure or controlling it at its source.
 - 4.2.5 Develop procedures that clearly state how to do the job safely.
 - 4.2.6 Train personnel to be aware of the hazard and to follow safe work practices to avoid it.
 - 4.2.7 Prescribe and ensure use of personal protective equipment to protect employees against the hazard.
- 4.3 Interim control measures should be used if permanent control measures cannot be instituted in a timely manner. Interim control measures may consist of, but not be limited to:
- Removing employees from the worksite;
 - Discontinuing unsafe work practices;
 - Implement measures listed in Section 4.2 where feasible as interim hazard control.
- 4.4 Any hazard that cannot be immediately corrected will be prioritized by the first line supervisor based upon hazard severity and mishap probability.

5. COMMUNICATION

Communication between all employees, especially Port management and Port non-management employees is essential to the success of this Safety Program. The Port will use the following methods to facilitate two-way communication between management and staff:

5.1. SAFETY AND HEALTH TRAINING (please refer to Section 9 TRAINING AND INSTRUCTION)

5.2. NEW EMPLOYEE ORIENTATION

- 5.2.1 A general orientation session for all new employees includes rights and responsibilities for a safe work environment along with encouragement to communicate with their supervisor and to report hazards to their supervisor or Port Health & Safety staff.
- 5.2.2 In addition, the supervisor of a new employee is required to review position specific health and safety items. A blank Workplace Safety Orientation Checklist Form is posted on the PortWeb (intranet site).

5.3 SAFETY MEETINGS

- 5.3.1 Supervisors shall ensure that their employees are trained on the health and safety hazards of their jobs. Section-specific safety and health topics can be incorporated into regularly scheduled staff meetings and trainings. Safety meetings and trainings will be documented and the records will be forwarded to and maintained by Port Health & Safety staff.
- 5.3.2 The Maintenance supervisors shall conduct “tailgate” safety meetings with their employees every 10 working days. All other supervisors are encouraged to have safety meetings or to promote workplace safety monthly. At a minimum, non-maintenance supervisors shall have quarterly safety meetings. These meetings may be incorporated into a regularly scheduled staff meeting. Safety meetings must be documented. The records will be forwarded to and maintained by Port Health & Safety staff.
- 5.3.3 Employees are encouraged to suggest ideas for improving safety during safety meetings.
- 5.3.4 To assist supervisors, Port Health & Safety staff can provide safety and health training material and information on various topics.
- 5.3.5 Maintenance Supervisor Safety Meetings are held under the direction of the Deputy Director for Maintenance every month. The purpose is to discuss safety issues, review recent employee and vehicle accidents, and recognize supervisor safety performance.

5.4 **BULLETIN BOARD** - Port Health & Safety staff will ensure that Cal/OSHA mandated and other health and safety-related items are posted at each establishment. Port Health & Safety staff will maintain a current list of items to be posted.

5.5 **INTRANET** - The Health and Safety page of the Port's Intranet site (PortWeb) contains health and safety information, including forms, Port policies and programs, safety meeting resources, and Codes of Safe Practices (safety procedures).

5.6 PROCEDURE FOR EMPLOYEES TO REPORT UNSAFE AND UNHEALTHY WORK CONDITIONS

- 5.6.1 It is critical that employees report unsafe and/or unhealthful working conditions and practices and, where appropriate, propose possible solutions. Under no condition will an employee be retaliated against for reporting a hazard. However, NOT reporting a hazard may lead to an employee personnel action.
- 5.6.2 Employees must report emergency situations immediately to their supervisor or any available Port management representative. For non-

emergency situations, three reporting methods may be used:

- The problem may be reported verbally to the supervisor.
- The problem may be reported to the employee's supervisor by use of a Safety Suggestion Form. A blank Safety Suggestion Form is posted on the PortWeb (intranet site). These reports can be made anonymously.
- Employees may submit reports to their Division Manager or the Port Health & Safety staff.

5.6.3 When a Safety Suggestion Form is received, the supervisor shall contact Port Safety and Health staff within one workday for guidance on responding to the suggestion.

6. CODES OF SAFE PRACTICES (SAFETY PROCEDURES)

A written Code of Safe Practices that relates to the employer's operations is required for employment "that exists in connection with the construction, alteration, painting, repairing, construction maintenance, renovation, removal, or wrecking of any fixed structure or its parts". A Code of Safe Practices is a step-by-step procedure on how to perform a job safely. It is not a job description.

- 6.1. Port Health & Safety staff maintain the Codes of Safe Practices which apply to employees at the Port, regardless of whether the employee generally performs construction-related tasks. Copies of these Codes of Safe Practices are provided to each Maintenance Supervisor and are posted on PortWeb (intranet site).
- 6.2. Maintenance Supervisors shall develop workgroup, activity, and equipment-specific Codes of Safe Practice to provide safe working guidelines for their employees.
- 6.3. Should a supervisor and workgroup determine that it is infeasible to comply with a Code of Safe Practices, they must work with Port Health & Safety staff to develop a written alternate which affords employees equivalent or greater protection.
- 6.4. Supervisors shall periodically review the Codes of Safe Practices with employees. At a minimum, the relevant Code of Safe Practices shall be reviewed the first time an employee is introduced to a new task, process, equipment, and/or substance.

7. INCIDENT INVESTIGATION

- 7.1 All Port losses and potential losses ('near misses') must be investigated, documented and reported. A loss may include employee injury, a vehicle

accident, or equipment damage. A potential loss, or near miss, is any condition and/or incident in which it appears that an accident could occur and/or almost has occurred.

- 7.2 A thorough investigation will require that the supervisor:
 - 7.2.1 Go to the scene of the incident/issue and conduct a preliminary investigation
 - 7.2.2 Discuss the incident/issue with the involved employee(s) and other witnesses.
 - 7.2.3 Obtain input from involved employees on what could have prevented the incident, and/or what can prevent similar incidents, and/or correct the issue going forward.
- 7.3 For information on the forms that must be completed for employee injuries, including the Supervisor Incident Investigation Report, refer to the Health and Safety page of the PortWeb (intranet site) or the Port Personnel Policy and Procedures Manual.
- 7.4 For vehicle accidents, the Equipment Incident Report form must be completed and will serve as documentation of the investigation. A copy of the form can be found in most Port vehicles in the glovebox and on the Health and Safety page of the PortWeb (intranet site).
- 7.5 For losses other than employee injury and vehicle accidents, a narrative report should be completed to document the investigation. Samples can be obtained from Port Health and Safety staff.
- 7.6 Port Health & Safety staff shall be advised as soon as possible of any serious incidents that require Cal/OSHA notification. A serious injury or illness, as defined by Cal/OSHA, is an injury or illness that results in death; requires hospitalization for more than 24 hours for more than observation; results in the loss of any member of the body; or produces any serious degree of permanent disfigurement. The injury or illness does not have to be work related to be reported to Cal/OSHA.

8. EMPLOYEE COMPLIANCE

The Port will take all possible measures to ensure that employees comply with all safe and healthful work practices. The following methods will be used to encourage compliance.

- 8.1 Training and retraining programs which may include:
 - Safe work practices training;

- Training on the effect and use of new substances, processes, procedures, or equipment brought into a work area.
- 8.2 Recognition and incentives for employees who follow safe and healthful work practices, which includes:
- Utilizing employee performance appraisals to recognize individual safe work practices;
 - Giving regular verbal reinforcement for safe behaviors;
 - Employee and work unit recognition programs.
- 8.3 Appropriate personnel action for violating Safety Program requirements, in accordance with departmental policy, which may include oral and written employee counseling, re-training, written reprimands, and suspension.

9. TRAINING AND INSTRUCTION

- 9.1 Occupational Safety and Health training will be provided for all employees when:
- The employee is first hired
 - The employee is reassigned to job assignments with new hazards
 - New substances, processes, procedures, or equipment are brought into a work area and present a new hazard
 - New or previously undiscovered hazards are brought to the employer's attention
- 9.2 It is the first line supervisor's responsibility to ensure that his/her employees receive the necessary health and safety training. First line supervisors can request assistance from Port Health & Safety staff in fulfilling these training requirements.
- 9.3 At a minimum, the information to be provided to all employees will include the following subject matter:
- A review of the Port's Safety Program
 - A review of the employee's responsibilities and rights, including access to records
 - Safe work practices and procedures
 - A review of the procedure and the methods of reporting actual and/or suspected safety and health hazards
 - A review of the procedure to report occupational injuries and illnesses
- 9.4 Safety and health training must be documented in writing for each employee. Records must be forwarded to Port Health & Safety staff. These records shall contain the following information:

- Name of the course
- Date and time the course was conducted
- Facilitator(s) names
- Topics discussed
- Printed name of the employee
- Signature of the employee

9.5 The training material may be incorporated into regularly scheduled staff or safety meetings, but documentation is still required.

10. RECORD KEEPING

- 10.1 The forms referenced in this document, which are used to collect Safety Program mandated information, are available from Port Health & Safety staff, the Health and Safety page of the PortWeb (intranet site), and Supervisor's Health and Safety Workbooks ("Redbooks"). Forms include:
- Workplace Safety Orientation Checklist
 - Safety Meeting Record
 - Training Record
 - Safety Suggestion Form
 - Incident Investigation Forms
- 10.2 Port Health & Safety staff will maintain the following records in accordance with the Port's Record Retention and Destruction Policy:
- Periodic inspections and hazard abatement
 - Reports of unsafe/unhealthy work conditions (Safety Suggestion Forms)
 - Training records and safety meeting records
 - Occupational injuries and illnesses
 - Vehicle accidents
- 10.3 Employees have the right to access exposure and medical records. Exposure records can be obtained from Port Health and Safety staff and medical records can be obtained from the SFGH Occupational Health Clinic (415-206-6581).

APPENDIX A: PORT HEALTH AND SAFETY STAFF

Name	Phone Number	General Areas of Responsibility
George Bibbins, Senior Industrial Hygienist	Office: 415-274-0582 Mobile: 415-205-8317	<ul style="list-style-type: none">• Asbestos and Lead Abatement• Engineering Project/Building Permit Review• Prescription Safety Glasses• Confined Space Entry• Maintenance Environmental Issues• General Health and Safety
Karen Taylor, Safety Officer	Office: 415-274-0579 Mobile: 415-595-0521	<ul style="list-style-type: none">• Employee Injuries/Workers Compensation• Ergonomics• Safety Shoes• Vehicle Accidents• General Health and Safety

