



ALAMO
COLLEGES

ALAMO COLLEGES
ENVIRONMENTAL HEALTH & SAFETY PLAN

FINAL DRAFT
August 5, 2014

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MANAGEMENT COMMITMENT

A fundamental responsibility of the Alamo Colleges is the safety and health of our students, employees and visitors on any property owned or operated by the Alamo Colleges. As such, the District has developed a comprehensive Environmental Health & Safety Plan (EHSP) with supporting Standard Operating Procedures (SOPs). When implemented, this plan will provide the Alamo Colleges community effective tools to safely deal with potential hazards in and around our working and learning environments.

The Enterprise Risk Management (ERM) Department shall establish and implement an environmental health and safety program that anticipates, recognizes, evaluates and controls recognized hazardous conditions that may pose a potential risk.

No plan can completely prepare for every potential hazard that may impact our environment. However, the District Administration supports this plan in an effort to keep the members of the District community as safe as possible and urges all faculty, staff and students to not only be aware of the plan but to also be an active participant in the application of our safety program.

The District Environmental Health & Safety Plan and supporting Standard Operating Procedures are hereby approved. The Plan takes effect immediately and supersedes all previous versions.

Dr. Bruce H. Leslie
Chancellor

Official Effective Date: _____

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ACRONYMS USED IN PLAN

ACGIH.....	American Conference of Governmental Industrial Hygienist
ACPD.....	Alamo College Police Department
ANSI.....	American National Standards Institute
ASHRAE.....	American of Heating, Refrigerating and Air Conditioning
AVC.....	Associate Vice Chancellor
CERCLA.....	Comprehensive Environmental Response, Compensation & Liability Act
CFR.....	Code of Federal Regulations
CGA.....	Compressed Gas Association
CGAI.....	Compressed Air and Gas Institute
EHS.....	Environmental Health & Safety
EPA.....	Environmental Protection Administration
ERM.....	Enterprise Risk Management
ICC.....	International Code Council
IES.....	Illumination Engineering Society
ISEA.....	International Safety Equipment Association
MSDS.....	Material Safety Data Sheet
NEC.....	National Electrical Code
NFPA.....	National Fire Protection Association
NIOSH.....	National Institute of Occupational Safety and Health
NRC.....	Nuclear Regulatory Commission
NSC.....	National Safety Council
OSHA.....	Occupational Safety & Health Administration
PEL.....	Permissible Exposure Limits
RCRA.....	Resource Conservation and Recovery Act
REL.....	Recommended Exposure Limits
TAC.....	Texas Administrative Code
TCEQ.....	Texas Commission of Environmental Quality
TLV.....	Threshold Limit Value
TWA.....	Time-Weighted-Average
UL.....	Underwriters Laboratory
VPCS.....	Vice President of College Services

INTRODUCTION

The Environmental Health & Safety (EHS) Plan will provide comprehensive guidelines for the Alamo Colleges. The primary objective of this Plan is to promote safety and effective loss prevention practices. Making all employees aware of safe work habits through the adoption, implementation, and enforcement of the EHS Plan will ultimately reduce incidents and decrease expenditures.

This Plan is not exhaustive and other referenced and applicable safety and health standards must be consulted when necessary for appropriate guidance, requirements and other applicable directives. There are potential hazards that may not be included in the Plan which require consultation with EHS personnel before proceeding with an activity involving recognized risks.

PURPOSE

This Plan reflects the principles of the Alamo Colleges' Safety policy:

- ◆ The protection of human life is the first and most important concern at all times.
- ◆ Alamo Colleges' operations ensure the protection of the environment through best practices.
- ◆ Each employee, student, and visitor is responsible for prevention of potential incidents.
- ◆ Reductions in the number of environmental, health and safety incidents through investigation, inspection and evaluation are vital.
- ◆ Training and outreach increases individual awareness of environmental health and safety best practices.
- ◆ Unsafe behavior is unacceptable.
- ◆ Best practices require continual updates and revisions to safety protocols.

VISION

The Enterprise Risk Management will implement the best safety practices to successfully attain the District's Vision.

MISSION

Enterprise Risk Management will empower our diverse communities for success by protecting people and assets through collaboration and implementation of safe and healthful working and learning environments.

APPLICABILITY

The Alamo Colleges is an educational institution serving Bexar County and surrounding counties. This Plan applies to all staff, faculty, students, visitors, and volunteers associated with Alamo Colleges. Through the implementation of this plan, the safety and health of the individual takes precedence, regardless of their location or job responsibility.

PLAN AUTHORITY

The Environmental Health and Safety Program is promulgated under the authority of District Board Policy and the Chancellor's and President's and Vice Chancellors' (PVC) Advisory Group. The following laws, standards, regulations guides and best practices are the basis for the legal foundation for implementing this Plan:

1. Health and Safety Code 502, Hazard Communication Act
2. Health and Safety Code 506, Community Right-To-Know
3. Health and Safety Code, Chapter 754, Elevators, Escalators and Related Equipment
4. Health and Safety Code, Chapter 755, Boiler Law
5. Health and Safety Code, Chapter 361, Solid Waste Disposal Act
6. Health and Safety Code, Chapter 344, Mosquito Control
7. Texas Administrative Code, Chapter 290, Public Drinking Water
8. Texas Administrative Code, Chapter 265, Standard for Public Pools and Spas
9. Standard Methods for the Examination of Water and Wastewater
10. International Fire Code
11. International Building Code
12. International Mechanical Code
13. International Fuel and Gas Code
14. International Plumbing Code
15. ANSI Z358.1, American National Standard for Emergency Eyewash and Shower Equipment
16. ANSIZ308.1-2003, First Aid Kits
17. ANSI/ASHRAE Standard 55-1992, Thermal Environmental Conditions for Human Occupancy
18. 40 CFR Parts 100 – 299, EPA Protection of Environment Regulations
19. 29 CFR 1910.1200, Hazard Communication
20. 29 CFR 1910.132, Personal Protective Equipment
21. 29 CFR 1910.146, Permit-Required Confined Spaces
22. IES, Lighting Handbook, Reference and Application
23. NFPA Life Code 101
24. NFPA, NEC 70E, Standard for Electrical Safety in the Workplace
25. NFPA 1, Uniform Fire Code
26. NFPA 5000, Building Construction and Safety Code
27. NFPA, Fire Protection Guide to Hazardous Materials
28. NFPA 51B, Standard for Fire Prevention during Welding, Cutting, and other Hot Work
29. NFPA 10, Standard for Portable Fire Extinguishers

30. NFPA 96, Standard for Ventilation Control and Fire Protection of Commercial Cooking Operations
31. NFPA 654, Prevention of Fire and Dust Explosions from the Manufacturing, Processing, and Handling of Combustible Particulate Solids
32. NFPA 86, Standard for Ovens and Furnaces
33. Texas Department of Insurance, Bloodborne Pathogens, HS02-037B (4/09)
34. Texas Department of Insurance, Hearing Conservation, HS98-120C (6-05)
35. Texas Department of Insurance, Personal Protective Equipment, HS96-101 (10-06)
36. Texas Department of Insurance, Worker' Health and Safety, Workstation Adjustments for Comfort and Safety (HS98-135C 10-05)
37. Texas Department of State Health Services, Texas Food Establishment Rules
38. Texas Department of State Health Services, Texas Mold Assessment and Remediation Rules
39. Occupations Code, Chapter 1951, Structural Pest Control
40. Agriculture Code, Chapter 77, Fire Ant Control
41. City of San Antonio, Code or Ordinances Part II, Chapter 29 Streets and Sidewalks Article 1
42. Texas Department of Health, Texas Voluntary Indoor Air Quality Guidelines for Government Buildings, December 2002
43. Health and Safety Code, Chapter 385, Indoor Air Quality in Government Buildings
44. U.S. Environmental Protection Agency (EPA), Building Air Quality, ISBN: 0-86587-312-7, October 1992 Edition
45. Manual on Uniform Traffic Control Devices for Streets and Highways, 2012 Edition

RESPONSIBILITIES

Recognition and immediate correction of potentially hazardous operations and conditions is paramount. Effective training at all levels will be used to assure the work force is capable of performing tasks safely. Employees, students and visitors are responsible for following established safety practices and procedures to avoid injury. They are expected to question conditions that appear unsafe and report any potential hazard to a Supervisor, Alamo Colleges Police Department and to ERM.

Chancellor, Vice Chancellor of Finance & Administration and Associate Vice Chancellor of HR/OD

The Chancellor, Vice Chancellor of Finance & Administration and Associate Vice Chancellor of HR/OD have the authority and ultimate responsibility for providing a safe and healthful working and learning environment.

Director of Enterprise Risk Management

The Director of ERM is responsible for the effective implementation of ERM policies, procedures and EHS programs.

District Environmental Health & Safety Coordinator

The Safety Coordinator is responsible for the development, implementation and management of the EHS Programs.

College Presidents and Vice Chancellors

The Presidents and Vice Chancellors are responsible for the protection of personnel (staff, students, volunteers, and visitors), facilities, and equipment on their campuses and satellite locations and for the effective implementation of ERM policies, procedures, and programs. They will provide the leadership and positive direction essential in maintaining an effective loss prevention climate as a prime consideration in all operations.

College Vice Presidents

The Vice Presidents of College Services (VPCS) shall be the primary conduit for the communication between the college and the district ERM office. The VPCS shall serve as the chairman for the college safety committee and help establish a positive safety culture at the campus.

College Safety Committees

The safety committee shall function as a management resource to recommend improvements to EHS workplace safety program and to identify corrective measures needed to eliminate or control recognized safety and health hazards. The safety committee will be responsible for:

- ◆ Assisting in communicating procedures for evaluating the effectiveness of control measures used to protect employees, students and visitors from potential health hazards in the workplace and classroom.
- ◆ Assisting in reviewing and updating workplace safety rules based on incident investigations, EHS inspections, and any reports of unsafe work conditions or practices.

- ◆ Assist and respond to anonymous complaints and suggestions from employees and students.
- ◆ Promote safety awareness and outreach among employees and students.
- ◆ Make environmental health and safety an integral part of everyday operations.
- ◆ Work closely with ERM and make recommendations about program improvements.
- ◆ Assist in workplace safety education and training effectiveness.
- ◆ Provide an opportunity for free discussion of EHS incidents and preventive measures.
- ◆ Improve the cooperative spirit with supervisors and employees to develop a safe and healthy environment.
- ◆ Review unsafe conditions and make recommendations for corrections.
- ◆ The committee should be comprised of members from Facilities, Faculty, Staff, Facilities, ACPD and the Vice President of College Services. Meetings should be conducted at least quarterly. Minutes will be taken and a copy forward to ERM.

Supervisors

The District depends on and provides Supervisors with the authority to actively enforce the provisions of this EHS Plan. They are responsible for the safe actions of their employees and the safe performance of machines and equipment within their departments. A partial list of those responsibilities includes, but is not limited to, the following:

- ◆ Ensuring a safe and healthy work environment is maintained in their areas of responsibility by conducting inspections at least quarterly.
- ◆ Enforcing safe work practices and incident prevention within departments under their jurisdiction to the same extent they are responsible for production of services and education.
- ◆ Taking the initiative as well as encourage others to suggest and report any identified EHS deficiencies to Facilities and ERM.
- ◆ Verifying employees are adequately trained for their assigned job duties and are familiar with safe work procedures. Conduct periodic training classes as needed to maintain continuous on-the-job training for identified workplace hazards. Maintain a copy of all safety training records and forward a copy to ERM.
- ◆ Ensure employees are familiar the HAZCOM and Right-To-Know programs that includes a complete chemical inventory list and Material Safety Data Sheets (MSDS).
- ◆ Immediately investigate all incidents or injuries of personnel under their supervision by filling out the *Supervisor's Report / Injury to Employee* form. A copy of the form shall be forwarded to the ERM Department. The report is provided to ERM with the Employee's Injury Report.
- ◆ Inspect all tools and equipment and ensure all safety guards and other safety devises are being used.

- ◆ Verify employees are provided with and using all required personal protective equipment (PPE). Maintain protective devices and safety equipment in functioning order as specified by the manufacturer and replace when necessary.
- ◆ Require employees to report and document all incidents, near misses, and/or injuries to the ERM, their immediate supervisor, and/or ACPD, even in the case of a minor injury.
- ◆ Use the "buddy" system for tasks that involve hazardous work.
- ◆ Ensure potentially dangerous areas are marked, labeled and/or barricaded.

Employees

Employees are required, as a condition of employment, to exercise due care in the course and scope of performing their job duties to prevent injuries. Employees will:

- ◆ Report and document all injuries or incidents immediately to their supervisor, ERM and ACPD, no matter how minor the injury.
- ◆ Be certain instructions are completely understood before assigned tasks are started.
- ◆ Keep work areas clean and orderly at all times.
- ◆ Know proper lifting procedures. Ask for assistance when necessary.
- ◆ Know how to properly use, store, and maintain PPE.
- ◆ Read the instructions on the MSDS before using, storing, and disposing of chemicals.
- ◆ Avoid engaging in horseplay and/or distracting others.
- ◆ Review safety information posted on bulletin boards or distributed in work areas.
- ◆ Prevent damage or destruction of any warning or safety device
- ◆ Report all unsafe conditions to the supervisor, EMR, Facilities and/or ACPD.
- ◆ Attend all required environmental health and safety training.

Students

Students are required to exercise due care while on District property. Students should:

- ◆ Be certain instructions are completely understood before assigned tasks are started.
- ◆ Keep work areas clean and orderly at all times.
- ◆ Know proper lifting procedures. Ask for assistance when necessary.
- ◆ Know how to properly use, store, and maintain PPE.

- ◆ Read the instructions on the MSDS before using, storing, and disposing of chemicals.
- ◆ Avoid engaging in horseplay and/or distracting others.
- ◆ Review safety information posted on bulletin boards or distributed in work areas.
- ◆ Prevent damage or destruction of any warning or safety device
- ◆ Report all unsafe conditions to a Faculty member, ERM, Facilities and/or ACPD.

Safety Suggestions

Employees and students are encouraged to provide safety suggestions to ERM for consideration and adoption. You can submit the suggestions via a phone call or email as long as all necessary information is provided to assist ERM in identifying the area of concern.

Safety Promotion

The safety awareness program shall be conducted by ERM to assist each campus in the promotion of safety activities and safety awareness to employees and students.

EHS TRAINING PROGRAM

Training is an extremely important component of the District's Environmental Health and Safety program.

Initial Safety Training

The ERM Department shall provide an overview of the Environmental Health and Safety Program to all employees at New Employee Orientation.

Required Safety Training

The ERM Department shall conduct required District-wide safety training that include but not limited to HAZCOM, Right-To-Know, Workstation Ergonomic, and General Office Safety training periodically throughout the calendar year. These records will be stored in Alamo Colleges AlamoLearn system.

Departmental Safety Training

Job-Specific Training

- Supervisors will initially train employees on how to perform assigned job tasks safely. Supervisors NEVER assume newly-hired, newly-assigned, or reassigned employees are thoroughly trained on all job safety requirements.
- Supervisors will carefully review with each employee the specific safety rules, policies, and procedures that are applicable.
- Supervisors will observe employees performing the work. If necessary, the supervisor will provide a demonstration using safe work practices before an employee is permitted to do the work without supervision.
- Employees will receive safe operating instructions on new equipment prior to usage.
- Supervisors will review safe work practices with employees before permitting the performance of new, non-routine, or specialized procedures.

Periodic Retraining of Employees

- Employees will be retrained on safety rules, policies and procedures, and when changes are made to the EHS Safety Plan or as the job dictates.
- Employees will be retrained after the occurrence of a work-related injury caused by an unsafe act or work practice, and when a supervisor observes employees displaying unsafe acts, practices, or behaviors.
- Supervisors can obtain safety-related reference materials, videos, and other information from the ERM Department.

EHS Inspections

The ERM Department shall conduct inspections on District owned or leased buildings and properties to identify and correct unsafe conditions that may be potentially hazardous. These inspections can be announced and unannounced. The ERM Department has the full support of the Board of Trustees and the Alamo Colleges' Administration. Deficiencies and recommendations shall be annotated in an official written report.

PROGRAMS AND PROCEDURES

The following materials detail the implementation of the ERM Department's EHS Plan specifically for Alamo Colleges. All city, state, and federal safety regulations and laws shall be followed.

Hazard Communication (HAZCOM) Program:

- **HAZCOM Procedures:**

These procedures will ensure all employees and students working with or around chemicals know the associated hazards and the best way to protect themselves.

- **Chemical Hygiene Procedures:**

Science labs, including but not limited to, the Chemistry, Biology, Geology, Mortuary Science, Nursing, Veterinary, and Dental Departments, using and storing lab chemicals shall develop and implement a comprehensive written Chemical Hygiene Plan, in accordance with (IAW) the District's Hazard Communication (HAZCOM) Procedures.

- **Chemical Spill Procedures:**

Departments that use and store chemicals at their site shall have a spill control procedure and shall procure and maintain an approved chemical spill control kit. All chemical spills, no matter how small, shall be reported immediately to ACPD, Campus Administration, and ERM.

- **Chemical/Waste Disposal Procedures:**

Chemical, hazardous waste, regulated medical waste, and biohazard waste shall be picked-up for proper-disposal by an approved vendor in accordance with the District's waste disposal procedures.

- **Right-To-Know Procedure:**

MSDS information and a chemical inventory list must be maintained and available for each area where the corresponding chemicals are stored or used.

- **Tier II Chemical Report Procedure:**

The Texas Tier II Chemical Report provides protection for the public and the environment by annually reporting information on extremely hazardous chemicals and their health effects.

- **Hazardous Material Permits Procedure:**

ERM is responsible for the annual renewal of hazardous material permits for each College.

Electrical Safety in the Workplace Procedure:

Electrical safety provides a practical safe working and learning environment for employees and students relative to the hazards arising from the use of electricity in the workplace.

Lock-out/Tag-out (LOTO) Procedures:

All individuals working on energized objects or systems must protect themselves from the possibility of injury by securing the source of the energy.

Environmental Conditions for Human Occupancy Procedure:

ERM shall enforce the guidelines concerning the environmental conditions in the workplace. It is important to provide employees and students with a comfortable working and learning environment.

Hearing Conservation and Noise Hazard Procedure:

ERM shall enforce the guidelines concerning the hearing conservation program throughout the District by identifying potential noise hazard areas and equipment. This includes an effective medical baseline analysis program.

Heat Stress Injury Procedures: C.2.1.6 Procedures LINK

Excessive exposure to a hot working environment can bring about a variety of heat-related disorders/injuries. ERM is especially concerned for the health of District employees whose primary job requires working in extremely hot conditions.

Cold Weather Injury Procedures

These procedures were developed to provide guidance on the prevention of cold weather injuries for District's employees who jobs require working outside during decrease temperature.

Portable Space Heaters and Open Flames: C.2.1.2 Procedures LINK

Portable space heaters and open flame devices are prohibited in any District owned or leased property.

Indoor Air Quality (IAQ) Assessment Procedures:

ERM has developed and implemented a comprehensive proactive IAQ program that addresses potential hazards associated with common air quality issues in all District buildings. IAQ incorporates monitoring for asbestos and mold to ensure applicable compliance with city, state, and federal regulations, laws, and to minimize the potential exposure of employees, students and the public. ERM shall monitor all asbestos abatement and mold remediation projects.

Environmental Assessment Phase Procedures:

ERM and Facilities shall perform and/or solicit the services of a vendor certified to conduct a comprehensive environmental assessment (Phase I & II) of all donated or purchased real property prior to transfer of title. This assessment involves a visual inspection and/or comprehensive sampling of all land and/or structures.

Bloodborne Pathogen Procedure:

ERM bloodborne pathogen exposure control procedures are provided only as a guide to assist departments throughout the District in complying with the requirements of all applicable regulations and laws.

Personal Protective Equipment (PPE) Procedure:

ERM is required to develop, implement, and monitor the use of PPEs within the District. ERM will assist departments with detailed specifications for the selection, purchase, and use of PPE.

Construction Site Inspection Procedures:

ERM will conduct periodic unannounced environmental health/safety inspections of construction projects on District owned or leased properties.

First Aid and Over-The-Counter Medicines Procedure:

ERM recommends type-1 first aid kits be procured and installed in buildings throughout the District, in accordance with ANSI Standard Z308.1-2012. Each campus is responsible for the procurement and maintenance of the first aid kits. Employees are not to dispense oral medications to anyone.

Vermin and Insect Survey Procedure:

ERM shall evaluate each building during routine and/or requested inspections for signs of an insect or rodent infestation. Workplaces shall be constructed and maintained, as far as practical, to prevent the entrance or harborage of rodents, insects, and other vermin.

Ergonomic Assessment Procedure:

ERM shall conduct ergonomic assessments when necessary for District employees who require reasonable modifications. Ergonomics is the science of fitting workplace conditions and job demands to the capabilities of the employees.

Illumination Procedure:

ERM shall conduct illumination surveys to ensure areas meet minimum illumination requirements in buildings and grounds controlled by the District.

Holiday Decoration Procedure:

Holiday lighting and decorations will be restricted to safe operation and placement according to applicable regulations and laws. Decorations shall be noncombustible or shall be treated with an approved fire-retardant coating. In addition, natural cut Christmas and/or harvested trees are prohibited from use in all District building.

Water Quality Control Procedure:

ERM and Facilities will respond to all water main breaks on District properties. Facilities department personnel will coordinate with the local water authority to repair the water main on the distribution system. ERM shall take the necessary steps to ensure the water is safe for human consumption, which includes collecting water samples for bacteria and solids analysis

Prohibited Animal Procedure: C.2.1.3 Procedure

Animals are prohibited on District properties and in buildings except for service animals ~~and~~, animals that are a part of the class curriculum, internally approved wellness procedures, and in designated outdoor recreation areas at the discretion of the respective College Presidents utilizing signage.

Communicable Diseases Procedure: D.4.8 Policy & D.4.8.1 Procedure

The District shall comply with all pertinent statutes and regulations that protect the privacy of the District's employees and students who have a communicable disease. Communicable diseases include, but are not limited to bacterial meningitis, measles, influenza, viral hepatitis-A (infectious hepatitis), acquired immunodeficiency syndrome (AIDS), leprosy, methicillin-resistant staphylococcus aureus (MRSA), and tuberculosis.

Temporary Food Establishments Procedure: C.2.1.4 Procedure

Employee or student sponsored temporary food sales or fundraisers are permitted on District properties provided the events are not open to the public. Open to the public means the events shall not be posted in any newspaper or advertised using any medium that has a general distribution or if banners or signs are displayed in public view, this includes placing signs on public sidewalks.

Confined Space Procedure:

The District's Confined Space Procedure ensures the safety of personnel performing service or maintenance activities in confined spaces. Confined space is an enclosed area that is not designed for occupancy, its entrance is limited or restricted and can represent a risk for human safety.

Ladder Safety Procedure:

The Ladder Safety Procedure is designed to prevent injury to District employees using ladders and identifies the inspection requirements for fixed and portable ladders in accordance with all applicable regulations laws, and best practices.

Incident/Accident Investigations and Near Misses Procedures:

Workplace incidents can be a big liability to the District. Not only is it a terrible tragedy whenever an employee is injured while performing their job, but it can also have big financial consequences to the District as well. Losing a valuable employee for any length of time is expensive, and workplace accidents may also raise workers' compensation premiums.

A majority of incidents are avoidable and can be prevented with proper training or action. When incidents do occur, it is critical that we learn the root cause of the events so that future injuries can be avoided. As part of our safety program, ERM requires the direct supervisor of an injured worker to perform a thorough written post incident investigation and submit corrective actions to ERM.