5.03 Safety and Health Program Procedures

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1. OBJECTIVE

The purpose of this procedure is to establish and implement a safety and health program that describes the procedures, methods, processes, and practices used to manage workplace safety and health. Milwaukee County is dedicated to a "find it fix it" culture of proactively identifying and addressing hazards, preventing and reducing occupational injuries and illness for all employees, ensuring compliance with safety and health regulatory requirements, and maintaining a safe and healthy environment for employees and guests at all County owned and operated facilities and grounds.

2. DEFINITIONS

A. Unsafe Act – A human action that departs from or violates a safe procedure, or an activity that causes unnecessary exposure of a person, property, or the environment to a hazard.
B. Unsafe Condition – A physical circumstance that can lead to accident, injury and/or illness.
C. Occupational Accident – An unplanned event that interrupts the completion of a work activity and may lead to unwanted occupational injury, illness, loss, damage or impairment.
D. Occupational Injury – Any injury which results from a single incident work accident or exposure in the work environment.
E. Occupational Illness – An abnormal condition or disorder other than from an occupational injury caused by occupational exposure to environmental factors, such as acute (immediate) or chronic (over time) illness or disease from inhalation, ingestion, absorption, or direct contact.
F. Exposure – The condition of life, property, or the environment being unprotected from actual or potential unsafe acts or conditions.
G. Hazard – Any existing or potential condition or action that creates a risk which can result in unwanted losses to life, property or the environment.

H. Risk – Uncertainty about outcomes that can either be negative or positive.
I. Safety – A condition whereby measures are or have been taken to ensure prevention of personal harm, hazardous exposures, physical property, environmental impairments, or other losses. Freedom from danger, risk, accidents, injuries, and health.
J. Health – Freedom from physical disease, illness or pain.
K. Department. The Department of Administrative Services.
L. Safety Action – The steps that are taken to remove the cause or causes of an existing nonconformity or other undesirable situation. Safety actions address actual problems. In general, the safety action process is a problem solving process.
M. Find It Fix It – The act of proactively identifying and addressing potential safety hazards and/or property issues prior to the occurrence of loss.
N. Near Miss – Near misses describe incidents where no property was damaged and no personal injury sustained, but where, given a slight shift in time or position, damage and/or injury easily could have occurred.
O. Engineering Controls – Features of the work environment and job itself that have been included by design to attempt to eliminate hazards or reduce exposure to hazards.
P. Administrative Controls – Measures used to reduce the time an employee is exposed to a hazardous environment or job setting, such as by manipulating the work schedule or work practice.
Q. Root Cause – The one step in a sequence of events without which the accident would not have occurred.
R. Contributing Cause – Other concerns that must also be addressed in considering why an accident occurred.
S. Direct Costs –Accident and incident cost factors consisting of recognizable and definite losses involving operational, monetary and physical items of value.
T. Indirect Costs – Accident and incident cost factors that are definable, however may not be easily recognized or foreseen. They are in addition to direct accident and incident costs. Examples of indirect costs include: lost time by fellow employees, supervisor's time to investigate, training a substitute worker, poor efficiency due to break-up of crew, hiring costs, overtime to make up production, failure to meet deadlines/fill orders, loss of good will, loss of production, overhead costs while work disrupted, and downtime.

3. PROCEDURE

A. **Milwaukee County Written Safety and Health Commitment and Program Statement**

i. **Safety and Health Commitment –** Job safety and health starts with sound and meaningful commitment by upper management for the safety and health of employees. The written safety and health program, as developed, represents a course to be followed in light of existing and anticipated operations and activities. It is to be utilized to guide and determine present and future decisions and objectives regarding the management of safety and the mitigation of loss.

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The safety and health program statement has been created to note the overall purpose of Milwaukee County's safety and health procedures and inform all employees of their required active and ongoing participation. The program statement also reflects management commitment to safety and loss mitigation.

Administration shall ensure that the Milwaukee County safety and health program is made known to all employees upon hire and reinforced with employees no less than annually or as updates/changes are made. The program statement shall be posted in conspicuous places within each facility or operation where employees normally refer to posted information.

ii. **Safety and Health Program Statement –** Milwaukee County is dedicated to a "find it fix it" culture of proactively identifying and addressing hazards, preventing and reducing occupational injuries and illness for all employees, ensuring compliance with safety and health regulatory requirements, and maintaining a safe and healthy environment for employees and guests at all County owned and operated facilities and grounds.

1. This shall be accomplished through an on-going safety and health program.

2. All Milwaukee County agencies and departments shall maintain compliance with all Federal, State, and local regulations.

3. Milwaukee County places a high value on the safety of its employees and the general public. No job or task is so important that an employee must violate a safety rule or risk injury or illness in order to get the job done.

B. **Safety and Health Goals & Program Objectives –** Goals and program objectives should be established to carry out the safety health program statement. As developed, goals and program objectives will be supported and pursued by upper management, managers and supervisors, departmental safety professionals, and safety and health committees. Milwaukee County goals and program objectives include:

i. Reduce direct and indirect workers' compensation and other liability costs through accident, illness, and injury prevention programming.

ii. Develop and maintain department-wide support for all aspects of the safety and health program.

iii. Promote a "find it fix it" culture.

iv. Motivate, educate and train all employees to recognize, report and correct hazards and activities which could result in loss.

v. Engineer and administer safety and health into the design of facilities, operations, equipment usage/maintenance and job task performance.

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vi. Incorporate safety and health mitigation strategies into training, education and orientation program methods and techniques.

vii. Comply with all Federal, State, and local laws, regulations, ordinances, etc., regarding safety and health, and exceed requirements when necessary based upon the necessity to manage safety and prevent losses.

viii. Provide programs for inspection and maintenance of facilities, operations, job task performance, and equipment.

C. **Safety and Health Partnership – A Team Approach**

i. **Partnership -** Safety and health requires a partnership or team approach to maximize effectiveness of invested time, efforts, and monies. In order to be successful, departments along with upper management, managers and supervisors, and employees must partner together. Individual departments are not standalone. Milwaukee County is one entity with all departments, part of the same team. This partnership will ensure the ultimate goal, a "find it fix it" culture of proactively identifying and addressing hazards, the prevention and reduction of occupational injuries and illness for all employees, ensuring compliance with safety and health regulatory requirements, and maintaining a safe and healthy environment for employees and guests at all County owned and operated facilities and grounds.

D. **Responsibility, Accountability, and Authority**

i. **Milwaukee County Departments** – All Milwaukee County departments are responsible for establishing, maintaining, and enforcing safety and health procedures, programs, and training specific to the hazards and/or exposures that individual workers throughout their department may encounter. Departments are accountable for ensuring compliance with all safety and health regulatory requirements as well as providing a safe and healthy work environment. Authority for establishing, instituting, implementing, managing, and maintaining the safety and health program, ultimately lies with all Milwaukee County employees and is further described below.

1. **Upper Management –** Authority for establishing, instituting and enforcing safety procedures and program requirements is a function of the department director or managing administrator.

   The Director or managing administrator has the authority to delegate programs, tasks, and activities to comply with applicable safety and health regulatory requirements and mitigate loss. Exceeding minimum requirements may be necessary to effectively mitigate a potential loss scenario.

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Directors or managing administrators are responsible for ensuring that safety and health procedures and programs are established, maintained, and enforced. Public entity employers have the right or duty to supply a safe and healthy environment for employees and members of the general public who frequent their facilities.

a. **Specific responsibilities may include but are not limited to:**

i. Ensure that sufficient employee time, supervisor support and funds are budgeted for equipment, training, and carrying out the safety and health program.

ii. Evaluate supervisors each year to make sure that they carry out their responsibilities as described in this program.

iii. Ensure that incidents are fully investigated and safety action is taken to prevent the hazardous conditions or behaviors from happening again.

iv. Ensure that a record of injuries and illnesses is posted in the workplace. This information is kept and supplied via Risk Management.

v. Set a good example by following established safety and health rules and attending required training.

vi. Report unsafe practices or conditions to the supervisor of the area where the hazard was observed.

vii. Promote a culture of "find it fix it."

2. **Managers and Supervisors –** Managers and supervisors have the direct authority to implement, manage, plan, and enforce safety and health program activities as instituted by the department director or managing administrator. They are therefore accountable for performing these activities.

Managers and supervisor are responsible for utilizing safety and health regulatory requirements, procedures, and programs in preventing accidents, injuries, and losses. They are also responsible for carrying out activities as directed and required to ensure the program's success.

a. **Specific responsibilities may include but are not limited to:**

i. Ensure that each employee has received initial orientation before beginning work.

ii. Ensure that each employee is competent and has received training on safe operation of equipment or tasks before starting work.

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iii. Ensure that each employee receives required personal protective equipment (PPE) before starting work on a job task or duty requiring PPE.

iv. Perform a daily safety check of the work area. Immediately address any hazards.

v. Observe the employees you supervise while they are working. Promptly address any unsafe behavior. Provide additional training and take safety action as necessary.

vi. Document employee safety as part of their evaluations.

vii. Set a good example for employees by following the safety and health rules and attending required training.

viii. Follow 5.04 Accident and Claim Reporting Procedures and investigate all incidents in your area within twenty-four (24) hours.

ix. Accommodate all work related injuries and maintain communication with injured workers on a routine basis. This includes follow-up and status determination after each medical appointment

x. Talk to upper management and employees about changes to work practices or equipment that will improve employee safety and health.

xi. Promote a culture of "find it fix it" by granting employees the ability to identify and address safety hazards or property issues in the workplace.

3. **Employees –** Employees can expect a safe and healthy work environment. They also can expect to be supplied with information on hazards or potential hazards that may cause them harm. Employees can expect to be protected from such hazards.

   Employees are not permitted or authorized to create unsafe working conditions or to work in an unsafe manner. Employees must comply with all safety and health regulatory requirements, procedures, and programs. They must immediately report to appropriate management personnel all hazards, potential hazards, and all potential loss-causing conditions so that issues can be appropriately addressed.

   a. **Specific employee responsibilities may include but are not limited to:**

      i. Follow the safety and health rules established by Milwaukee County. Immediately, report unsafe conditions or actions to your supervisor, departmental safety professional, or safety and health committee representative immediately.

      ii. Immediately, report all near miss incidents to your supervisor.

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iii. Immediately, report all work-related injuries and illnesses to your supervisor, regardless of how minor they may seem.

iv. Follow 5.04 Accident and Claim Reporting Procedures, provide all return to work slips and appropriate documentation to your supervisor after each medical visit, and maintain routine communication with your supervisor throughout the entirety of your workers' compensation claim.

v. Always use personal protective equipment that is in good working condition when it is required.

vi. Do not remove or bypass any safety device or safeguard provided for your protection.

vii. Encourage your co-workers to use safe work practices on the job.

viii. Make suggestions to your supervisor, departmental safety professional, safety and health committee representative, or management about changes that will improve employee safety and health.

ix. Take initiative to identify and address safety hazards and property issues within your workplace, thus promoting a "find it fix it" culture. Remember, your personal safety comes first. Do not attempt to address any issue which creates a safety hazard for yourself.

E. **Education, Engineering, Administrative Controls, and Enforcement**

i. **Education** – An understanding of occupational safety and health can be accomplished through an ongoing educational program. Whether is required by code or standard, or simply desired for purposes of preventing loss, the educational process is the key to a successful safety and loss mitigation program.

ii. **Engineering** – Where it is feasible, engineering controls are to be utilized as a primary means of protecting workers, members of the general public and the environment from hazards and loss-causing potentials.

iii. **Administrative Controls** – Where it is not justifiably feasible to immediately implement engineering controls to prevent hazards or protect employees from hazards, administrative controls will be required. Administrative controls many times are required for use in conjunction with engineering controls.

iv. **Enforcement** – Employees are not authorized or permitted to create unsafe conditions or perform work activities in an unsafe manner. Enforcement of safety and health standards

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and procedures by management is necessary to protect employees and facility or operational frequenters from injury.

The act of simply "offering" protection may result in injury to those who do not feel the need to accept the "offer" to be protected. Willful neglect of required safety and health provisions where imminent danger or serious hazards exist or where fatalities or serious injuries occur may warrant criminal as well as civil penalties. The consistent and comprehensive enforcement of the safety and health program is vital to our success.

F. **Safety and Health Program Components –** Major elements of an effective safety and health program include: Management Commitment and Employee Involvement, Worksite Analysis, Hazard Prevention and Control, and Safety and Health Training.

i. **Management Commitment and Employee Involvement –** To achieve success, all Milwaukee County departments need to commit to the safety and health program. This starts with a top down approach. Upper management, followed by managers and supervisors, set the tone for safety and health performance, which is then reflected in employee behavior. Support generated at higher levels is one of the keys to a successful program.

1. **Recommended Program Activities Include but are not limited to:**

a. Establish and implement the written commitment and program statements.

b. Post and communicate the program and commitment for all employees.

c. Include employees as participants in the safety and health program and partner with other departments to accomplish common goals.

d. Routinely participate and provide management and/or employee representation in established committees such as the Milwaukee County Joint Safety Committee or the Vehicle Accident Review Committee (VARC).

e. Establish requirements, goals, and objectives for the program.

f. Ensure that appropriate safety and health requirements will be enacted by all employees including managers and supervisors.

g. Assign responsibilities as needed for all aspects of the program as developed, including responsibilities for supervisors, managers and individual employees.

h. Recognize safety and health accomplishments and enforce non-compliance.

ii. **Worksite Analysis –** Determination of workplace hazards, whether by the employer or by an employee, is one of the initial steps to be taken in the process of preventing and controlling

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accidents and injuries, as well as complying with regulatory requirements. Determination of facility or operation specific hazards or potential loss-causing factors is conducted to create targeted prevention programming.

Hazards can be identified through:

- Facility and operational safety surveys
- Periodic self-inspections and change surveys
- Development of job safety analysis
- Analysis of occupational accidents, injuries, illness and losses

1. **Facility and Operational Safety and Health Surveys** – Initial and annual facility and operational safety surveys should be performed by either departmental safety professionals or trained in-house personnel such as facility or operations managers, area supervisors, or other members of management. Surveys should seek out where hazard exposures are and where work accidents, injuries, illnesses or other types of losses may occur. Surveys should also include recommendations for correction of determined hazards and/or loss-causing exposures.

2. **Periodic Self-Inspections and Change Surveys –** Frequent self-inspections and change surveys are also recommended and should be performed by either departmental safety professionals or trained in-house personnel such as facility or operations mangers, area supervisors, or other members of management. These individuals should be familiar with the survey area and its potential exposures to identify new or previously missed hazards and failures in hazard controls.

   Change surveys will evaluate any changes to new equipment, production processes or the building structures. The purpose is to evaluate and examine the changed conditions and makes recommendations to eliminate or control any hazards that were or may be created as a result of the change.

   Employees should also consider aspects of the jobs they perform, especially if duties change, and report potential exposures and new or previously missed hazards and failures in hazard controls.

3. **Job Safety Analysis –** A job safety analysis (JSA) is a procedure that helps integrate accepted safety and health principles and practices into a particular task or job operation. In a JSA, each basic step of the job is to identify potential hazards and to recommend the safest way to do the job. Other terms used to describe this procedure are job hazard analysis (JHA) and job hazard breakdown.

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JSAs have many benefits. The analysis process may identify previously undetected hazards and increase the job knowledge of those participating. Safety and health awareness is raised, communication between workers and supervisors is improved, and acceptance of safe work procedures is promoted.

Four basic stages in conducting a JSA are:

- Selecting the job to be analyzed
- Breaking the job down into a sequence of steps
- Identifying potential hazards
- Determining preventive measures to overcome these hazards

a. **Job Selection for Analysis –** Ideally, all jobs should be subjected to a JSA. In some cases there are practical constraints posed by the amount of time and effort required to do a JSA. Another consideration is that each JSA will require revision whenever equipment, raw materials, processes, or the environment change. For these reasons, it is usually necessary to identify which jobs are to be analyzed. Even if analysis of all jobs is planned, this step ensures that the most critical jobs are examined first.

   Factors to be considered in setting a priority for analysis of jobs include:

   - Accident frequency and severity: jobs where accidents occur frequently or where they occur infrequently but result in disabling injuries.
   - Potential for severe injuries or illnesses: the consequences of an accident, hazardous condition, or exposure to harmful substances are potentially severe.
   - Newly established jobs: due to lack of experience in these jobs, hazards may not be evident or anticipated.
   - Modified jobs: new hazards may be associate with changes in job procedures.
   - Infrequently performed jobs: workers may be a greater risk when undertaking non-routine jobs, and a JSA provides a means of reviewing hazards.

b. **Breakdown of Job –** Each step of the breakdown for a job or activity should describe in detail and in the sequence of the task that is being performed.

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Try not to create an overly detailed breakdown with unnecessarily lengthy and numerous steps. Also, attempt to avoid a breakdown which is too general and does not record the basic step-by-step process of the task or activity.

c. **Hazard and Loss Potential Identification –** For each sequential step, identify and detail all potential hazards and potentials for loss. This includes physical, chemical business interruption/consequential damages, and environmental and monetary loss potential.

d. **Preventive Measures –** The final stage in a JSA is to determine ways to eliminate or control the hazards identified. The generally accepted measures, in order of preference, are:

   i. **Eliminate the Hazard –** This is the most effective measure. These techniques should be used to eliminate the hazards:

      - Choose a different process
      - Modify an existing process
      - Substitute with less hazardous substance
      - Improve environment (ventilation)
      - Modify or change equipment or tools

   ii. **Contain the Hazard –** If the hazard cannot be eliminated, contact might be prevented by using enclosures, machine guards, worker booths or similar devices.

   iii. **Revise Work Procedures –** Consideration might be given to modifying steps which are hazardous, changing the sequence of steps, or adding additional steps.

   iv. **Reduce the Exposure –** These measures are the least effective and should only be used if no other solutions are possible. One way of minimizing exposure is to reduce the number of times the hazard is encountered. An example would be modifying machinery so that less maintenance is necessary.

e. **Job Safety Analysis Utilization –** In order to be successful, job safety analysis must have management approval and be supported and enforced by managers and supervisor. Analyses must also be thoroughly reviewed with affected employees upon hire, change of job tasks and/or activities assigned, and no less than once annually.

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Safety and health training should include the utilization of all relative job safety analyses for the operation, facility, and tasks being performed. Job safety analyses should be considered prior to facility, operation and job activity changes which will determine in advance the hazard and loss potential regarding the change.

When accidents, injuries, illnesses and/or losses occur, the job safety analysis should be reviewed for the job or activity(s) involved. Causation information can then be determined and strategies for future prevention and/or control can be developed.

Job safety analysis can also be used as a training tool. The topics and materials covered through JSAs are ideal for departmental safety and health meetings as well as tool box talks. For these reasons and many others, job safety analysis is the cornerstone to program success.

As job safety analyses are completed and exposure reviews of facilities and operation are performed, procedure topics can be determined. Procedures should then be developed and implemented. They should detail specific hazard prevention and compliance strategies as well as how to work safely in and around such hazards. Safety and health regulatory requirements compliance criteria should be stated in the analysis.

4. **Analysis of Occupational Accidents, Injuries, Illnesses and Losses.**

   a. **Reporting –** Directors and managing administrators shall ensure that all accidents, incidents and hazards which could cause or have resulted in employee or third party injury, illness or loss are immediately reported to area, facility or operation management and supervision. All injured personnel shall receive prompt medical attention from any first-aid or CPR certified individuals present and as necessary from local emergency response agencies such as the paramedics, fire department, etc.

   Employees shall immediately report all work injuries, illness, accidents, “near-miss” accidents, and hazards to supervision for investigation and safety action.

   Accidents can, but do not always, result in occupational injuries, illnesses, or losses. An incident resulting from a single, instant event is typically an injury, while one that results from a prolonged exposure to a hazardous substance or environmental factor is an illness. A loss may be the result of an accident whether an injury/illness occurred or not. A loss in this context may result in property or environmental damage and/or other monetary loss.

   Employee injuries that can occur from the performance of County employment duties may be considered work-related and may be compensable as per the State of

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Wisconsin Workers' Compensation Act. These injuries are referred to as occupational.

Employee injuries that occur outside the course and scope of the performance of County employment duties are not compensable under the Workers' Compensation Act and are referred to as non-occupational.

Milwaukee County is self-insured for Workers' Compensation. The County is therefore responsible for proper and expedient management, payment and processing of reported claims, in accordance with the State Workers Compensation Act.

Please refer to Milwaukee County Administrative Procedure 5.04 Accident and Claim Reporting for detailed instructions on Workers' Compensation Claim Procedures.

Injuries that occur to third parties (non-County employees) from County facilities or activities may represent a liability to the County. In the event of such occurrence, the local law enforcement agency should be contacted and a police report should be filed.

b. **Investigation –** Immediately upon notification of an accident, incident or hazard, management and supervision, department's designated safety and health professional or safety and health representative as appropriate and available, shall perform an investigation. Those performing the investigation should notify risk management and/or county legal counsel in case of a fatality, serious injury or potentially extensive exposure.

Where determination is made that an imminent danger or an immediate, life-threating or severe injury-causing hazard exists, the operation, activity, facility, etc., shall be safely shut down. Access to all areas where such injuries, illnesses and losses could occur shall be prevented until safety actions are completed to eliminate and/or protect all individuals from physical, chemical and/or environmental unsafe acts, conditions or hazards. All safety action taken to remedy the hazard shall be performed utilizing appropriate safety and health practices and procedures so as to not cause additional injury, illness or loss.

Investigation into accident, incidents, and losses start the moment they occur or are reported. Accident investigation is necessary to:

- Determine the root cause(s) of the accident or loss;
- Gain knowledge of how to prevent similar incidents from being repeated;
- Develop information for future use in the event of litigation.

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Initial investigation is usually made by the area supervisor, as he/she may be the first person in authority on the scene. Additional personnel who should be involved in accident investigation may include available safety and health professionals, area managers, risk management or legal counsel. In some cases, a professional accident investigation representative providing a non-biased professional opinion may be necessary or desirable where losses are extensive or litigation is anticipated.

For accident investigation to be a successful part of a safety and health program, it must be performed to determine facts, not search for fault. All aspects and causal factors of what led to the accident, incident or hazard, as well as how it occurred, should be recorded in detail. Minimum information should be gathered immediately after an accident or incident to determine who, what, when, where, how and why facts, including, but not limited to:

- Employee or general public information.
- Incident or occurrence time and date factors.
- Employee(s) or general public statement and description of occurrence or incident.
- Witness accounts of occurrence or incident.
- Police, fire, paramedic and other emergency response report information.
- Supervisory description (if known) of occurrence or incident.
- Equipment operation and usage information relative to occurrence or incident if applicable.
- Review of task or work activity description for operation being performed (job safety analysis) with discrepancies, if any, noted.
- Protective and prevention measures provided and utilized or not utilized.
- Injury and loss information.
- Recommended safety action to prevent future accidents and/or losses.
- Follow-up to all above-listed items to ensure safety and health, as well as to ensure regulatory compliance.

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- Photographs and possibly video footage of the incident are also recommended to quantify unusual circumstances and may be taken to provide additional documentation of pertinent facts at the scene.

- Any material collected in the course of an investigation must be collected and secured. Destroy nothing without consulting risk management or legal counsel.

The Milwaukee County First Notification of Injury Form can be found via 5.04 Accident and Claim Reporting Procedures. The designated safety professionals Milwaukee County Accident Investigation and Safety Action Report form is attached to this document.

i. **5 – Why Method –** One method of investigating accidents is the 5-Why method. This method helps to determine the cause-effect relationships in a problem or failure event. It can be used whenever the real cause of a problem or situation is not clear. Using the 5-Whys is a simple way to try solving a stated problem without a large detailed investigation requiring many resources. When problems involve human factors this method is the least stressful on participants. It is one of the simplest investigation tools easily completed without statistical analysis. By repeatedly asking the question "why?" you peel away layers of issues and symptoms that can lead to the root cause. More obvious explanations may have yet more underlying problems. But it is never certain that you have found the root cause unless there is real evidence to confirm it.

   Individuals start with a statement of the situation and ask why it occurred. Individuals than turn the answer to the first question into a second Why Question. The next answer becomes the third Why question and so on. By refusing to be satisfied with each answer individuals increase the odds of finding the underlying root cause of the event. Though this technique is called "5-Whys", five is a rule of thumb. You may ask more or less Whys before finding the root of the problem.

c. **Injury/Illness Statistical Analysis –** Formal statistical analysis of work injuries and/or illnesses is primary function of Risk Management. Statistical analysis can help determine where accident or incidents are occurring and to what degree. Analysis can help in preventing incidents from being repeated. It can also help target programming County wide and at individual department levels through recognition, avoidance, and prevention of similar loss causing hazards.

   Upon request, Risk Management will provide statistical analysis to any Milwaukee County department. In addition, loss leading departments will receive personalized presentations in the form of annual risk reviews. Risk reviews provide a comprehensive statistical analysis of all losses for all lines of insurance coverages.

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d. **Occupational Injury and Illness Log and Summary** – Risk Management shall ensure that a log of all occupational injuries and illnesses is completed and maintained for each department and/or division.

The log and summary for occupational injuries and illnesses will consist of "recordable" injury/illness occurrences.

Recordable injuries and illnesses consist of:

- Occupational fatalities
- Nonfatal occupational injuries involving loss of consciousness, days away from work, restricted work or job transfer, or medical treatment beyond first aid.
- All non-fatal occupational illnesses.

A recordable injury log must be maintained, as such injuries occur, on the OSHA 300A form. Recordable occupational injuries and illness must be logged on the OSHA 300A form within seven calendar days after notice that such an injury or illness has occurred.

Copies of the entire completed OSHA 300A form shall be sent to the County Safety Manager, Courthouse Room 302, 901 N. 9th St, Milwaukee, WI 53233.

e. **OSHA 300A Form Posting Requirement** – Department heads and managing administrators shall ensure that a copy of the completed OSHA 300A summary of illnesses and injuries form is posted in a conspicuous place at each location where notices are customarily posted. The posting shall remain up from February 1 to April 30 starting with the year 2015 report form.

iii. **Hazard Evaluation, Prevention and Control** – Upon determination of workplace facility and operational hazards, evaluation of hazards should be performed. Hazards are recommended to be addressed in a prioritized fashion whereby high risk conditions are addressed first. It should be noted that this does not mean other injury or illness causing conditions should be ignored or that lower risk hazard safety action should be delayed.

Where determined hazards could cause death, extensive illness and/or losses to facilities or the environment, immediate safety action will be necessary. These hazards would include those which are referred to as "imminent danger" hazards.

Hazards whereby severe injury, illness, property damage, equipment, and/or operational damage occurs are referred to as "serious" hazards. Serious hazards are secondary to imminent danger hazards.

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A “marginal” hazard is one in which injury, illness, equipment damage or operational dysfunction may result but would not cause serious impairment.

A “minimal” hazard is one in which would most likely not result in more than a first-aid injury or illness.

When permanent safety action cannot be immediately performed, temporary safety action should be taken to include performing one or more of the following tasks:

- Preventing access to hazard areas.
- Removing personnel from hazardous exposure areas.
- Performing tasks manually or by alternate safe means instead of continuing to use unsafe equipment.
- Use of safe temporary equipment while permanent equipment undergoes repairs.
- Educating and training of employees in temporary alternate means of performing tasks safely.

Hazard prevention starts by establishing specific safe work procedures and ensuring that employees understand and follow established procedures. Procedures for safe work should be based upon facility/operational conditions, activities, and hazards, as determined.

Equipment and operations should be made safe and provide protection to employees or other area frequenters from inherent hazards. Engineering controls are considered the most reliable and effective way to eliminate hazards and should be the first priority of each department. Administrative controls that limit exposure to hazards by adjusting the work schedule or work practice are seen as the second priority for each department. Finally, when engineering and administrative controls are not effective or cannot be performed, personal protective equipment should be utilized.

1. **Safe Work Procedures/Rules –** Each department is responsible for creating, reviewing, updating, and enforcing internal safety work rules. Safety work rules should be tailored based upon facility/operational conditions, activities, and hazards, as determined within their department and its divisions.

    a. **Basic Safety and Health Rules –** The following basic safety and health rules have been established to help make Milwaukee County a safe, healthy and efficient place to work. These rules are in addition to safety and health work rules established by each department. Failure to comply with any safety and health rule may result in disciplinary actions.

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i. Never do anything that is unsafe in order to get the job done. If a job is unsafe, report it to your supervisor, departmental safety professional, or safety committee representative. We will find a safer way to do that job.

ii. Do not remove or disable any safety device! Keep guards in place at all times on operating machinery.

iii. Never operate a piece of equipment unless you have been trained and are authorized.

iv. Use your personal protective equipment when it is required.

v. Obey all safety warning signs.

vi. Loose clothing will not be worn around moving machinery. Hair longer than shoulder length shall be tied back or secured in a hair net.

vii. Working under the influence of alcohol or illegal drugs is prohibited.

viii. Do not bring firearms or explosives onto Milwaukee County property, unless prescribed for official job duties.

ix. Horseplay, running, and fighting are prohibited.

x. Report spills immediately so that they can be cleaned up promptly by appropriately trained employees or contracted employees can be contacted.

xi. Replace all tools and supplies after use.

xii. Do not allow materials, especially combustible materials, to accumulate where they will become a tripping or fire hazard. Keep lids on trashcans at all times.

xiii. Do not block any fire extinguisher, fire exit or exit pathway with materials or equipment.

2. **Planning and Preparing for Emergencies/Emergency Training and Drills –** Each department and its divisions are responsible for reviewing, updating, and enforcing the Milwaukee County Continuity of Operations and Emergency Action Plans established by the Office of Emergency Management. The Office of Emergency Management has provided templates for both of these plans and provides updates, training, and drills as necessary to maintain compliance with regulatory authorities. To receive copies of these documents please contact the Office of Emergency Management.

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3. **First Aid and CPR Medical Program** – For operations and facilities where no medical facilities such as clinics, hospitals or physicians are in close proximity or within reasonable accessibility, personnel should be certified in first aid and CPR (cardiopulmonary resuscitation). Even where medical facilities are available or reasonably close, first aid and CPR trained individuals can be life savers, and may keep minor injuries from becoming major until medical help arrives.

   The American Red Cross, American Lung Association and other accredited agencies offer certified training and may be contacted for assistance as to how many employees should be trained and to what extent, based on the facility/operation hazard potential, occupancy and exposure. Additionally, the Office of Emergency Management, through its Emergency Medical Services (EMS) division has the capabilities to deliver the appropriate level of training to Milwaukee County staff.

   A properly designed first aid and CPR program targets safe performance of tasks, with prevention of blood borne disease transmission as a high priority. Protective equipment, including surgical gloves and approved one-way resuscitation devices, protects individuals when properly used and should be supplied for use in the event of emergency and for use whenever first-aid treatment and/or CPR is administered.

   Accredited agency programs should be reviewed by safety and health and medical professionals to ensure all safety and health techniques are included as part of the first-aid and CPR programs.

   It is recommended that each County department shall maintain and post a list of their certified individuals, with certification dates, expiration dates, etc. As facility personnel change, the roster should be updated, with new individuals certified and re-certified as necessary.

iv. **Safety and Health Training** – Department heads and managing administrators shall ensure that employees are properly and adequately trained and educated where codes, standards or other regulatory requirements require or necessitate employee training or where training can be used as a tool to mitigate potential accidents and losses. Training refers to the presentation of pertinent information.

Any employee training that is performed should provide adequate safety and health information and instruction to employees for personal safety, safety of fellow employees, and safety of other area of facility frequenters.

All employees need to be properly and appropriately trained in safety and health program criteria:

- To ensure compliance with laws, regulations and standards.

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- Specific to individual job tasks.
- Whenever new or updated facilities, operations or processes are created.
- To avoid having accidents and injuries.
- To inform them of current new or updated information, policies, procedures, regulations, etc.
- To develop or improve an individual's efficient, productive and/or safe job task or activity performance.
- To motivate safe job performance.
- To decrease waste.
- To inform individuals of hazards, and procedures to protect them from hazards.
- To prevent reoccurrence of occupational accidents, injuries, illnesses, or losses.
- Upon hire and/or reassignment of duties.
- On an annual or even more frequent basis, as required.

1. **Training Determination and Identification** – Prior to training development, determination needs to be made as to whether training is required, or whether it is desired as part of a solution to a safety and health problem.

   Hazard determination process analyses information can be compared to applicable standards or other governing regulatory requirements. Development of training to ensure compliance shall then be performed.

   Training may also be viewed as a possible problem-solving solution, but should not take the place of implementing engineering, administrative, or PPE controls to deal with potential hazards.

   Once determined, specific training needs should be identified. The training identification process is based upon what specific employee safety and health performance is required to achieve compliance and/or accomplish desired levels of employee competency.

   Job safety analysis information can be referred to and used as part of the training process. Refer to page 9 of this program and procedure for information on job safety analysis.

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Information from accident/injury records and reports can also be used in the training process whereby incidents are researched as to cause, and training is then designed to prevent recurrence. Refer to page 15 of this program and procedure for statistical analyses information on occupational injuries and illnesses.

Employee workplace and activity observations and interviews can result in identified training needs where deficiencies are noted.

Similar industry or service field training programs can be researched for comparison purposes to help ensure completeness of developed training programs.

Risk Management can conduct safety needs assessments as required/requested by departments to further help determine what training is applicable to their staff members. A safety needs assessment is a detailed review of operations and job classifications to further determine the appropriate training for staff members. An example of a safety needs assessment template form is attached to this procedure.

2. **Training Goals and Objectives –** Upon identification of training requirements or desires, specific, measureable, attainable, results-focused, and time-bound (S.M.A.R.T) goals and objectives can be developed. Objectives should be developed prior to performing training and should identify what the training individual or group will have learned and be able to do upon completion of the training process.

   After training goals and objectives have been completed, learning activities that enable training process employees to demonstrate learned skills and knowledge should be developed. Typically, this is a "hands-on" activity that is observed step-by-step by qualified and competent individuals to ensure safe task performance. The job safety analysis can once again be utilized during the hands-on process to verify safe performance of each task step.

   Training programs and activities should be evaluated to ensure that desired goals and objectives are being accomplished. An employee performance review before and after the training process can indicate the amount learned, and the amount of reinforcement which may be necessary where unsafe activities are found to continue. The evaluation plan should be developed along with training session objectives and content materials.

   Evaluation can include:

   - Completion of questionnaires by attendees.
   - Supervisor or manager observations of employee performance.
   - Verification of workplace improvements through review of accident and injury rates.

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3. **Conducting Training –** Milwaukee County safety professionals shall ensure that safety and health training programs are conducted in a manner and format conducive to achieving stated goals and objectives, and in a form that ensures communication to all affected individuals.

   For employees to become engaged and motivated to learn safety and health training information, they will need to appreciate its value to their personal safety and health, as well as the safety and health of co-workers and the public.

   A detailed safety and health training program incorporates training for all employees. Job performance should not only be measured by production and quality, but should be measured by the combination of production, quality, and safety. The three are equally important and when combined form the perfect workplace triangle. This results in the optimal performance of employees and departments.

   Training should supply all necessary information to perform all aspects of a job task or operation safely, and in such a manner as to prevent or limit the potential for loss.

   Upper management, line managers and supervisors, and all employees must receive training in safety and loss prevention. Each must understand his/her role(s) in establishing and maintaining a successful program to prevent and control work injuries, illnesses, and losses.

   When properly performed, training serves as an important safety and health communication tool. Training should guide and direct employees to perform a job task or activity safety, skillfully and efficiently. It should also be used as chance to hear employee concerns which relate to the training topic. It is important to remember that management may develop and present procedures, work rules, and training programs, but employees must be properly engaged and motivated to apply the safety and health concepts, procedures, and programs to reflect management's commitment to safety and health.

4. **Upper Management Training –** For the safety and health program to become a successful part of performing job tasks and activities within facilities and operations, upper management must be supportive of all program criteria. Their support and backing can be gained through safety and health training.

   The type of training provided to upper management is different from that provided to managers/supervisors and employees. Upper management training should be targeted to include:

   - Purpose and objectives to the program.

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- How safety and health contribute to productivity and efficiency.

- Regulatory safety and health requirements and responsibilities for safety and health.

- Possible consequences of willfully maintaining an unsafe workplace.

- Why and how management must engage and motivate supervisors and employees to actively incorporate safety and health programming into job tasks and activities for operations and facilities.

- How and when program effectiveness should be established and monitored.

- An overview of information that managers/supervisors and employees will be receiving.

5. **Manager and Supervisor Training –** Managers and supervisors are vital individuals in a successful safety and health program. This is especially true for the topic of training. Employees should receive instruction on how to perform a job task or activity directly from management and supervision.

   Employees also look to supervision for appropriate guidance in special or emergency situations. Manager and supervisor influence over employees must include safety techniques to complement the overall program. Safety and health training must be provided to managers and supervisors on a regular basis. It will provide them with another tool to enhance productivity, quality, and employee engagement and motivation.

   For manager and supervisor training to be a success, it should incorporate the following:

   - Manager and supervisor specific involvement in the safety and health program, including what upper management's expectations are.

   - Managing and supervising the prevention of accidents, hazards and losses.

   - Manager and supervisor safety and health responsibilities.

   - Regulatory, legal, and ethical requirements.

   - Training in safety and health practices for their employees.

   - How managers and supervisors should train and engage and motivate their employees to work safely and prevent losses.

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- Training all specific areas of safety and health that their employees must know, such as: regulatory compliance, emergency response, reporting of hazards, filing of workers' compensation claims, etc.

Milwaukee County offers OSHA 10 and OSHA 30 hour courses to fulfill these requirements. The OSHA 10 hour and 30 hour courses provide training for managers and supervisors on the recognition, avoidance, abatement, and prevention of safety and health hazards in the workplace. The courses also provide information on workers' rights, employer responsibilities, etc. Registration for both the OSHA 10 hour and OSHA 30 hour courses is available through the Milwaukee County learning management system.

6. **Safety and Health Professionals –** Upper management, managers, and supervisors and virtually all other employees look to safety and health professionals for guidance, training, education, and information. Safety and health professionals must constantly keep up-to-date with current and upcoming safety and health requirements, practices and concepts to meet the needs and demands for successful program communications.

   To train, educate and guide others, safety and health representatives must first receive the same.

   Safety and health professional development seminars are one of many sources of training and education. Many are available at a small cost, or, in some cases, free of charge. Caution should be observed to verify the competency of the sponsoring agency presenting the seminar. Safety and health professionals should search out program availability and verify program content with in-house application of information to maximize the training and education experience. Concepts learned during these development opportunities should then be incorporated into the Milwaukee County Safety and Health Program.

7. **Outside Training Professionals** – Milwaukee County may choose to utilize outside training professionals to deliver safety and health materials/training. These individuals may include, but are not limited to, insurance loss control consultants, original equipment manufacturing consultants, governmental inspectors and agency representatives, etc.

   The qualifications of the outside training professional and content of training provided by these individuals must be verified prior to any training being conducted at Milwaukee County. This will ensure quality of delivery and application to Milwaukee County employees.

8. **Training Documentation and Recordkeeping –** As with all training and education, permanent documentation and recordkeeping is necessary. Training that is not documented cannot be verified. Documentation may include time, date, personnel sign-

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in attendance, personnel absent, location where presented, topic(s) discussed, questions to be answered, follow-up items, whether completed or pending, etc.

Safety training documentation and recordkeeping should be maintained through the Milwaukee County Learning Management System (LMS). The LMS serves as a repository for training documentation and is a useful tool in organizing/verifying compliance with training needs.

Training courses delivered by Risk Management require managers and supervisors or employees to pre-register. Once registered, managers and supervisors are responsible for ensuring that employees attend the designated training. Risk Management will verify attendance and complete sign-off documentation through the LMS.

9. **Training Competency –** Training may include formal and/or informal testing on the information presented to employees. This can indicate success or the need for improvement of training and education programming, which will ultimately result in training success.

10. **Employee Training –** Employees consist of all individuals taking direction from management as covered in this section. For employees to carry out their tasks and activities in accordance with the safety and health program, they must be given information that should engage and motivate them to do so.

    Employees may have a right to information under Federal or State standards, regulations, etc. Along with providing required training comes the responsibility for employees to carry out and implement the safety and health techniques and requirements into all tasks and activities. Training will best complement the safety and health program where it goes beyond required criteria and includes all subjects and subject matter where safety is a factor and where loss can be mitigated.

    When developing an employee safety and health training program, a guideline should be followed to:

    - Establish what the accomplishment(s) of the training will be.
    - Determine desired employee behavior.
    - Determine how desired behavior can be achieved and how it will prevent accidents and losses.
    - Determine how successful implementation of training information can be measured, based upon anticipated behavior modification (i.e., reduction of accidents or reduction of losses, etc.)

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- Determine current knowledge of employees in the subject matter area (i.e., will training consist of complete program or just a refresher?)

- Verify effectiveness and accuracy of applicable training and safety information and techniques.

- Verify enforcement and management support for required safety and health performance criteria for information to be presented.

- Verify required training and education criteria for the topic being presented.

Employees must know what is expected of them in performing their job's tasks and activities. This should include employee safety and health expectations. Employees must also know what to expect from management and supervisors when safety practices are not followed, when an emergency occurs, when unsafe conditions are reported, etc. Employee training programs and sessions should include anticipating employee response to information presented.

Questions asked to which immediate certain response cannot be assured should be deferred for a reasonable time limit to verify interpretation. Upon interpretation verification, the training group can be informed of the answer(s) to questions asked in bullet form, at a future training meeting and/or through supervisory staff. This will depend on the importance of information verified.

Hands-on application of classroom-presented safety and health information consists of actual guidance for employees as they are performing the task or activity. This style can yield a high rate of return for the training time investment. Employees should be trained to recognize, avoid and prevent unsafe and unhealthy working conditions and conditions which may result in a loss.

11. **Temporary Worker Training –** To ensure that there is a clear understanding of each employer's role in protecting employees, OSHA recommends that the temporary staffing agency and the host employer set out their respective responsibilities for compliance with applicable OSHA standards in their contract. Including such terms in a contract will ensure that each employer complies with all relevant regulatory requirements, thereby avoiding confusion as to the employer's obligations.

    In addition, departments that utilize temporary workers need to provide a safe working environment. Departments should ensure that proper PPE, on the job training, and overall safe work practices and performance information is provided to such workers.

    Contractor Safety Training – It is the responsibility of the contractor to initiate and maintain safety training and compliance programs that meet or exceed OSHA standards and all applicable Federal, State, and Local safety, health, and environmental regulations.

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12. **Training Support Materials –** Support materials are recommended for use to enhance and add credibility to training programs and sessions. A wide variety of resources are available to such as:

    - Job safety analysis
    - Topic handouts
    - Workbooks
    - PowerPoint Presentations
    - Prezi Presentations
    - DVDs
    - Films/slides
    - Demonstrations
    - Simulations
    - Practice sessions
    - Textbook references
    - Safety and health regulatory requirements
    - Safety and health manual topics

    Individuals using such resources must make sure the information can be tied into the training topic and can be related specifically to the desired behavior expected from all who receive the session, program or information.

G. **Safety and Health Recordkeeping –** Department heads and managing administrators shall ensure that appropriate safety and health records are established and maintained:

- To ensure regulatory required compliance.
- To minimize expenditures for any compliance required engineering and administrative controls.

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- For use as documentation in the event of disciplinary action or workers' compensation legal litigation.

- To ensure that hazards reported are recorded, and that timely safety action is taken.

Types of safety and health activities that should be properly documented and recorded include, but are not limited to:

- All work accidents, incidents, injuries or illnesses

- Accident/incident investigations

- Safety meetings

- Safety orientation and indoctrination

- Safety and health facility and activity inspections

- Industrial hygiene surveys and analyses

- Other safety related activities as deemed appropriate

The OSHA 300A form for occupational injuries and illnesses is required to be maintained for a minimum of five years.

Occupational medical records are required to be maintained for the duration of an individual's employment plus 30 years.

Training records should be maintained for a minimum of three years, but are recommended to be maintained, along with medical records, should future reference be desired.

4. FORMS

The following attached forms are to be used in compliance with this procedure:

Form #	Form Title
5.03 (a)	Job Safety Analysis
5.03 (b)	Milwaukee County Accident Investigation and Safety Action Report
5.03 (c)	Safety Needs Assessment

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