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Safety Awareness and Training	ACA Standards: 2-CO-1C-05, 5-ACI-3B-02M, 5-ACI-6E-05, 4-ACRS-1C-10M, 4-APPFS-3B-07		
Scott Crow, Director Oklahoma Department of Corrections	Signature on File		

Safety Awareness and Training

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

Safety Awareness and Training is accomplished through staff designated to provide appropriate training, conduct appropriate inspections to identify workplace hazards, and investigate accidents to prevent reoccurrence. Employees responsible for the supervision of inmate workers will be trained on general occupational health and safety rules and will be provided with the required resources to train inmates to safely perform their assigned duties. (40 O.S. § 403)

I. Definitions

A. Terms

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

1. Inmate

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

2. Safety Consultants

Qualified employee who works for the Environmental Health and Safety (EHS) unit and is responsible for safety related matters, and develop/monitor the safety plans at their assigned/designated facilities.

3. Safety Designee

Employee designated by the facility/unit head and trained by EHS staff to perform safety related duties and coordinate safety and sanitation responsibilities.

II. Safety Programs

The goal of the agency's safety awareness program is to ensure a safe work environment by providing employees and inmates the knowledge and awareness necessary to remain safe throughout the course of their daily job activities.

A. Written Safety Plans

1. Facilities and Units (5-ACI-6E-05, 4-APPFS-3B-07)

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

2. Guidelines

At a minimum, written safety plans will follow the guidelines set forth in this procedure and provide sufficient details to define the responsibilities and authority of all employee's. The following requirements will be included:

- a. Implement and reinforce agency commitment to staff and inmate safety and health issues;

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- b. Provide written procedures for identifying and controlling workplace hazards;
- c. Develop and communicate safety plans and work procedures to affected persons; and
- d. Provisions for safety training for supervisory staff, other employees, and inmates.

B. Hazard Identification and Reporting

1. Planning

Each facility/unit's written safety plan will include the identification of any work place hazards and efforts for correcting them in a timely manner. (5-ACI-6E-05, 4-APPFS-3B-07)

2. Methods

At a minimum, hazard identification includes the following methods:

- a. Biannual/Annual inspections;
- b. Analysis of past accident reports;
- c. Workers' compensation claims analysis;
- d. Industry recommendations;
- e. Safety training program evaluations;
- f. Work rules;
- g. Inspections and work place evaluations;
- h. Facility/unit objectives;
- i. Review of first aid stations;
- j. Review of employee suggestions and complaints;
- k. Review of and communication to employees regarding the status of corrective projects;
- l. Conduct a Hazard/PPE Assessment for all job tasks of the workplace utilizing the "Personal Protective Equipment Hazard Assessment, Equipment Selection, and Training Documentation" ([DOC 100401B](#), attached); and

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

3. Hazard Reporting

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

- a. Employees will immediately inform their supervisors of any safety related situations beyond their ability or authority to correct;
- b. Employees are encouraged to report all safety violations;
- c. Once identified, work place hazards will be immediately reported to the safety consultant/safety designee or the employee's immediate supervisor;
- d. Deficiencies will be documented on an "Incident/Staff Report" ([OP-050109](#), [Attachment A](#)) and submitted to the respective facility/unit head through the appropriate chain of command. Documentation will be completed and submitted immediately upon identification of a problem.

C. Housekeeping and Maintenance

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

1. Inspections

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

- a. Trip hazards;
- b. Overhead hazards;
- c. Clutter;
- d. Fire hazards;
- e. Health hazards;
- f. Tool and equipment maintenance; and
- g. Mechanical, electrical, and hydraulic system problems.

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

1. Availability of PPE

The facility/unit head and the safety consultant will ensure that the required PPE and other safety equipment are available and accessible as identified in the Hazard/PPE Assessment, or as needed.

2. Safeguards

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

Staff and inmate shall visually inspect powered industrial equipment/machinery prior to operation/use and document any deficiencies.

3. Proper Use of PPE and Equipment

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

E. Communication

1. Enforcement

a. Facility/unit heads will ensure that all employees and inmates are aware of safety rules, standards, and codes required by outside regulatory agencies (ODOL, OSHA, ODEQ, etc.) by maintenance of these materials or conspicuous postings in areas accessible to all employees and inmates.

b. The Oklahoma Department of Labor (ODOL) requires the posting of the Occupational Safety and Health Act of 1970 (OSH Act), P.L. 91-596 (OSHA form 3165-O9R) or the state equivalent poster. The federal poster and the state form is available on the ODOL website at <http://www.ok.gov/odol/>.

Violations of this policy and/or regulatory agencies codes/standards will be subject to disciplinary action as outline in [OP-110415](#) entitled "Progressive Disciplinary Procedures."

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2. Responsiveness

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

III. Safety Training

A. Safety training is designed to reduce the incidence of workplace accidents, illnesses, and injuries.

1. All employees and inmates will be provided with the appropriate training and equipment prior to working in a potentially unsafe work environment. Staff supervising inmates will be responsible for ensuring inmates in their area are properly trained.
2. The Training and Staff Development unit will maintain records to ensure all employees receive the required safety training in accordance with this procedure.
3. The designated safety consultant will assist in providing training materials, as needed.
4. Each facility/unit's health and safety program will be evaluated by the designated safety consultant annually, by September 1 of each year, utilizing the "Annual Health and Safety Evaluation Form" ([DOC 100401C](#), attached).

B. Development

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

C. Content

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The employee and inmate safety-training program will provide training relevant to the work performed, with the goal of reducing worker injury and illness. The administrator of Environmental Health and Safety will review and update training materials at least annually or more frequently, upon regulatory changes. Safety training will include:

1. The responsibility of the individual for their own health and safety and the health and safety of their co-workers and inmates under their supervision;
2. The responsibility of immediate supervisors to review safe work practices of their employees and inmates including:
 - a. Recognizing and reinforcing work safety; and
 - b. Correcting employees and inmates who fail to follow safety rules or safe practices and instructing them in proper procedures.
3. The proper use, availability and maintenance of personal protective equipment (PPE) and the circumstances for its use;
4. Equipment maintenance; and
5. Emergency procedures.

D. Documentation

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

IV. Staff Responsibilities

A. Inmate Work Crew Supervisors

Staff, assigned the supervision or oversight of an inmate work crew utilizing powered industrial equipment/machinery, will be trained on each piece of equipment/machinery that will be operated/used during their assignment to the work crew.

Each supervisor shall:

1. Provide safety training to inmates.
 - a. General safety training is available through the Environmental Health and Safety unit;

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- (1) Ensure sufficient time for the presentation of the training material and sufficient time for inmates to complete the required test for each training course;
 - (2) Ensure each inmate successfully completes the corresponding the training course, to include testing as applicable; and
 - (3) Ensure all safety training conducted is submitted to the Environmental Health and Safety unit for review.
2. Inmates will not operate powered industrial equipment/machinery prior to receiving training in the operation/use of; to include awareness of any safety hazards and/or required safety measures (protective equipment, etc.);
- a. Staff and inmates must utilize all protective safety equipment, attachments and/or accessories required by the manufacturer to safely carry out the functions of the powered industrial equipment/machinery;
 - b. Staff and inmates must wear appropriate attire that is properly fitted prior to using any equipment in which clothing/accessories could become entangled. Crew supervisors will not allow inmates to operate equipment when wearing attire that creates safety concerns;
 - c. Inmate training will include the proper utilization/operation of each piece of equipment/machinery the inmate may be assigned to operate/use. In the event a facility does not have access to a piece of powered industrial equipment/machinery's operational manual or manufacturer's safety information or there is no staff with experience/expertise in the use/operation, the administrator of Environmental Health and Safety will be contacted immediately for assistance in obtaining materials or resources for the equipment/machinery training.
 - d. Inmate training will be documented utilizing the ODOC "Inmate Attendance Roster" ([DOC100401D](#), Attached) and will include; identifying training type (equipment/machinery), employee providing the training and signature and date of inmate(s) in attendance. Course rosters and tests will be filed and be retained by the supervisor and available for review, upon request.
 - (1) During monthly inspections of facilities or during any tour for inspection, Environmental Health and Safety

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staff will conduct random checks of work crews, food service areas, factories, farms, etc., to ensure training has been conducted and training records for assigned staff and inmates are documented and are accessible.

- (2) Facilities will develop and incorporate a process for conducting random checks of training records of Inmates assigned the use/operation of powered Industrial equipment/machinery, to include job site observation during operation.
- e. Staff and/or inmates will not operate powered industrial equipment/machinery (owned or rented) that has been altered/damaged to the point of affecting the safe operation of said equipment. This includes equipment that is fully functional but with modifications to safety switches, guards, etc. Equipment falling into this category will be taken out of service immediately until such time a replacement is acquired or repairs made to bring the equipment into compliance with manufacturer specifications. Any exceptions will require inspection and written approval by the administrator of Environmental Health and Safety.

B. Safety Consultants

The safety consultant will have sufficient authority and facility access to implement the facility/unit written safety plan to include:

1. Developing and communicating safety plans, rules, and work procedures, as approved by the facility/unit head, for identifying and controlling workplace hazards;
2. Assisting supervisors in providing training for employees and inmates in safe and healthy work practices;
3. Conducting a thorough review of each work place accident, whether or not it results in an injury, to determine the cause of the accident and to prevent recurrence;
4. Coordinating the activities of the safety committee;
5. Maintaining a complete Chemical Inventory List (CIL) and Safety Data Sheets (SDS) reference manuals in accordance with [OP-150310](#) entitled "Hazard Communication";
6. Assisting in the development of emergency plans, as required;
7. Identify and address any workplace hazards;

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8. Conducting inspections for compliance with codes, regulations and standards in all areas, at a minimum of once a month, in accordance with [OP-130107](#) entitled “Standards for Inspections” and utilizing [DOC 130107B](#) entitled “Monthly Health and Safety Inspection Report”; (5-ACI-3B-02M, 4-ACRS-1C10M)
9. Conduct random checks of training records for work crews, food service areas, factories, farms, etc., to ensure training has been conducted and training records for assigned staff and inmates are documented and are accessible;
10. Maintaining operational and work procedures for job functions;
11. Establishing workplace objectives to address agency safety goals;
12. Recommend safety recognitions to the safety committee/administrator of Environmental Health and Safety;
13. Working with outside regulatory agencies and the Environmental Health and Safety unit in accident investigations, safety inspections, and annual audits;
14. Serve as subject matter expert for fire alarms and sprinkler systems;
15. Maintaining all relevant safety records; and
16. Performing the related duties of the safety designee (outlined below) at designated facilities as required.

C. Safety Designees

Each facility/unit head will designate a qualified staff member to serve as the safety designee as outlined in [OP-130107](#) entitled “Standards for Inspections.” The safety designee will report to the facility/unit head and perform safety related duties to include, but not limited to:

1. Compiling weekly inspection reports, quarterly fire and weather drill reports, and other safety related documentation for review and maintenance by the assigned safety consultant; (5-ACI-3B-02M, 4-ACRS-1C-10M)
2. Escort vendors for inspections/services for pest control, fire alarms, sprinkler systems, fire extinguishers, kitchen hoods or other fire equipment;
3. Serving as a member on the safety committee; and
4. Assisting with annual updates of the facility CIL and SDS manuals.

V. Safety Committees

A. Composition

Each facility/unit will form a safety committee comprised of at least one representative from each area (i.e., administration, maintenance, security, food service, unit management, medical services, etc.) the safety consultant/safety designee and additional employees, who have volunteered to serve, or as appointed by the facility/unit head.

B. Term

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

C. Administrative Responsibilities

Administrative responsibilities of the safety committee include:

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

Meeting minutes will be provided to the facility/unit head and safety consultant for review.

D. General Responsibilities

General responsibilities of the safety committee include:

1. Inspecting the facility/unit safety and health practices and providing general safety awareness;
2. Planning improvements to existing safety and health rules, procedures and practices;
3. Recommending suitable hazard elimination, reduction, and control measures;
4. Reviewing and updating existing work practices and hazard controls;
5. Assessing the implications of changes in work tasks, operations, and processes;
6. Monitoring and evaluating the effectiveness of safety and health recommendations and improvements;

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7. Reviewing workplace accident reports;
8. Reviewing and analyzing accident and injury data; and
9. Encourage staff to submit recommendations/suggestions to enhance or promote overall facility safety.

VI. Investigations

A. Purpose

The purpose of the accident fact-finding investigation is to identify the cause(s) and to prevent the recurrence of accidents. All workplace accidents will be reported to the administrator of Environmental Health and Safety, Risk Management Coordinator as well as the affected division head and, when applicable, will be investigated by the assigned safety consultant/designated staff. Fact finders will:

1. Re-assure those interviewed that their statements will be used to correct conditions that contribute to injuries and illnesses.
2. Ensure that any hazardous conditions discovered are promptly corrected.

B. Fact Finding Process/Initial Investigation

All job related accidents resulting in injury, or having the potential to cause injury to employees, are to be reported immediately in accordance with [OP-110345](#) entitled "Workers' Compensation Insurance" utilizing "Workers' Compensation Incident Investigation Report," ([DOC 100401A](#)). All job related accidents resulting in injury, or having the potential to cause injury to inmates, are to be reported immediately. The Fact Finding Process will be initiated promptly by the immediate supervisor of the involved employee or inmate, or another employee as designated by the facility/unit head.

1. The results of the investigation will be summarized utilizing the "Workers' Compensation Incident Investigation Report" ([DOC 100401A](#), attached). Any employee or inmate who is involved in, witnesses or has direct knowledge of an incident involving inmates or employees will record the incident on the "Incident/Staff Report" ([OP-050109](#), [Attachment A](#)) and submit it to the facility/unit human resource management specialist/representative (HRMS) within one working day of the injury.
2. The facility/unit human resource management specialist/representative will provide copies of the accident report to the:

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- a. Agency workers' compensation claims administrator;
 - b. Appropriate division head or designee;
 - c. Safety Consultant/investigator, upon request; and
 - d. Risk Management Coordinator, upon request.
3. In addition to any injured employee(s) and/or inmate(s), all witnesses are to be interviewed as quickly as possible. Only employees will be interviewed in investigations concerning an employee and/or contractor.
 4. When a formal police report or other official non-departmental investigation is conducted by any government agency, a facility/unit designee will obtain the name, badge number, and agency/or business card of the investigator. The designee will also inquire as to when the official report will be available.
 5. The EHS unit may conduct follow-up accident investigations as directed by the administrator of Environmental Health and Safety.

C. Accident Investigations

1. Initiation

All workplace accidents/injuries will be referred to the Risk Management Coordinator who, if warranted, will assign an investigator to conduct an accident investigation. All accidents/incidents involving a state-owned/leased vehicle will be investigated. This investigation will identify the cause(s) of an injury/accident and will provide recommendations to prevent the recurrence of accidents. Fact finding investigations will ensure:

- a. That conditions which contribute to injuries and/or illnesses are noted; and
- b. Any hazardous conditions discovered are promptly corrected.
- c. The Environmental Health and Safety unit/risk management coordinator may initiate an accident investigation when one or more of the listed circumstances occur; all public, employee, contractors, and inmate accidents are included:
 - (1) A person is seriously injured to the extent that medical or emergency treatment is needed beyond first aid or there is the possibility of long-term consequences as

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the result of a workplace accident;

- (2) More than one person is injured in the same incident;
- (3) There is the propensity for an accident/injury to reoccur if changes are not implemented;
- (4) An inmate is seriously injured; or
- (5) A Workers' Compensation incident as defined in [OP-110345](#) entitled "Workers' Compensation Insurance" is filed.

2. Reporting

A job related accident resulting in the death of an inmate or an inmate who received medical care outside of an agency facility will be reported immediately by the facility head/designee to the risk management coordinator by telephone and then followed up by electronic mail (email) within 48 hours of the accident. This electronic notification will be made to the EHS email (safety@doc.ok.gov) and will include a brief and concise summary of the incident.

3. Incident/Accident Investigation Process

- a. All accident investigations will be assigned by the risk management coordinator to a safety consultant or designee.
- b. All incident/accident investigations will be completed and sent to the risk management coordinator and, upon approval, will be submitted to the administrator of Environmental Health and Safety.
- c. Incident/accident investigations concerning serious bodily injury and/or inmate injury/death, will be forwarded to the administrator of Environmental Health and Safety for approval.
- d. Upon final approval by the administrator of Environmental Health and Safety, the completed report will be forwarded to the affected facility/unit head for corrective action and completion of applicable training, if needed.
- e. At a minimum, investigations will address the details of the accident and the person(s) involved, to include witnesses, root cause, and recommendations for corrective action.
- f. When a formal police report or other official non-departmental

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investigation is conducted by any government agency, the agency investigator will obtain the official report and include it in their review.

4. Incident/Accident Investigation Distribution

All incident/accident investigations will be reviewed and distributed by the Environmental Health and Safety unit designee.

VII. Records

A. Record Keeping System

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

B. Record Review

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

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

VIII. References

OP-020202 entitled "Management of Office Records"

OP-050109 entitled "Reporting of Incidents"

OP-110345 entitled "Workers' Compensation Insurance"

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OP-110415 entitled "Progressive Disciplinary Procedures."

OP-130107 entitled "Standards for Inspections"

OP-150310 entitled "Hazard Communication Program"

OSHA Act, Title 29 CFR 1910.

40 O.S. § 403

IX. Action

The division/facility/unit head and administrator of Environmental Health and Safety is responsible for compliance with this procedure.

The administrator of Environmental Health and Safety is responsible for the annual review and revisions.

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

This procedure is effective as indicated.

Replaced: OP-100401 entitled "Safety Awareness and Training" dated December 9, 2020

Distribution: Policy and Operations Manual
Agency Website

<u>Referenced Forms</u>	<u>Title</u>	<u>Location</u>
DOC 100401A	“Workers’ Compensation Incident Investigation Report”	Attached
DOC 100401B	“Personal Protective Equipment Hazard Assessment, Equipment Selection, and Training Documentation”	Attached
DOC 100401C	“Annual Health and Safety Evaluation Form”	Attached
DOC 100401D	“Inmate Attendance Roster”	Attached
DOC 130107B	“Monthly Health and Safety Inspection Report”	OP-130107
<u>Attachments</u>	<u>Title</u>	<u>Location</u>
Attachment A	“Incident/Staff Report”	OP-050109