



PEND OREILLE COUNTY PUD



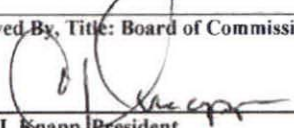


Document Title: <p style="text-align: center;">SAFETY POLICY</p>	Effective Date: 10-6-2020 Original Date: 7-30-19	Code: <p style="text-align: center;">OPERATING</p>
Document Owner, Title:  <hr/> Adam Wiltse, Safety Manager	Document Type: <p style="text-align: center;">Policy</p>	Confidentiality Category: <p style="text-align: center;">PUBLIC</p>
Approved By:  <hr/> F. Colin Willenbrock, General Manager	Audience: District wide	
Approved By, Title: Board of Commissioners  <hr/> Curtis J. Knapp, President  <hr/> Richard A. Larson, Vice President  <hr/> Joseph B. Onley, Secretary	Approved Date: <p style="text-align: center; font-size: 1.2em;">October 6, 2020</p>	Next Review Date: <p style="text-align: center;">Based on the District's needs</p>

Table of Contents

1	Purpose.....	3
2	Introduction.....	3
3	Regulatory Oversight.....	3
4	Safety Program Implementation.....	3
4.1	<i>Accident Prevention Program</i>	3
4.2	<i>APP Officer</i>	5
4.3	<i>Independent access to General Manager and Board of Commissioners</i>	5
4.4	<i>Independent Management of the Safety Policy and APP</i>	5
4.5	<i>Safety Policy and APP Resources</i>	5
4.6	<i>Leadership Support and Engagement</i>	5
4.7	<i>Communications of the Safety Policy and APP</i>	6
4.8	<i>Safety Policy and APP Evaluation and Review</i>	6
4.9	<i>Safety Policy and APP Training</i>	6
4.10	<i>APP Compliance Monitoring and Audit</i>	6
4.11	<i>Safety Policy Accountability and Enforcement</i>	7
4.12	<i>Safety Policy Internal Control Implementation</i>	7
4.13	<i>Safety Risk Assessments and Metrics</i>	8
4.14	<i>Measurable Safety Performance Targets</i>	8
4.15	<i>Communications & Coordination of the Safety Policy</i>	8
4.16	<i>Reporting of Workplace Injuries and Illnesses</i>	8
5	Document Management.....	9
5.1	<i>Recordkeeping</i>	9
5.2	<i>Review Period</i>	9
6	Version History.....	9

1 Purpose

The Public Utility District No. 1 of Pend Oreille County (“District”) Safety Policy establishes the District’s commitment to protecting the safety and health of all District’s employees, contractors and the public.

2 Introduction

The District’s Board of Commissioners and senior management are committed to fostering a safety culture consistent with its core values and ensuring fulfillment of its regulatory obligations through the adoption of the Safety Policy by a Board resolution.

All District employees, contractors, vendors, and third parties shall comply with the Safety Policy and the associated plans, procedures, practices, guidelines, and internal controls.

The District shall regularly communicate the Safety Policy to all District personnel, including contract staffing. All District personnel, and affected contract staff, shall receive a copy of the Safety Policy, or be directed to the District’s OGM SharePoint location to view the document. Safety Policy updates will include notifications to all District personnel and affected contract staff. District vendors and contractors will be provided the Safety Policy and training related to their responsibilities for implementing the District’s safety practices.

3 Regulatory Oversight

The District is committed to implementing safety and health practices consistent with the Washington State Administrative Codes (WAC); the Washington Industrial Safety and Health Act 1973 (WISHA); the Federal Occupational Safety and Health Administration (OSHA); the Department of Transportation (DOT) and Department of Licensing (DOL); and, as enforced by the Washington Division of Occupational Health and Safety (DOSH)/Washington State Department of Labor and Industries (L&I). The applicable safety and health regulations and other information is located using:

- WAC - <https://lni.wa.gov/safety-health/safety-rules/rules-by-chapter/WISHA - https://app.leg.wa.gov/RCW/default.aspx?cite=49.17>
- OSHA - <https://www.osha.gov/>
- DOSH/L&I - <https://www.lni.wa.gov/Safety/Rules/Policies/DOSHManuals/default.asp>
- DOT/DOL - <http://www.wsdot.wa.gov/commercialVehicle/Restrictions/default.aspx?View=CC&refnum=16747&action=1>

4 Safety Program Implementation

4.1 Accident Prevention Program

The District Safety Department shall implement the Safety Policy through a written Accident

Prevention Program (APP) and other safety programs. The General Manager, or designee, is responsible to approve the APP annually and safety programs. The APP is required to address the following goals:

1. Process and procedure for safety orientation of all District staff that includes a description of the District's total safety program.
2. General employee safety guidelines, plans, and monthly safety meetings to prevent employees, contractors and the public from incurring on the job injuries, occupational illnesses, near misses and accidents.
3. A plan or plans for the administration of Personal Protection Equipment to ensure all employees have personal protection equipment available to conduct their jobs in a safe manner.
4. A plan or plans for the administration of Equipment Safety and Heavy Equipment Safety to ensure all employees have proper training to perform their jobs in a safe manner.
5. A plan or plans for the administration of a Hazardous Materials, including Material Safety Data Sheets, so all employees are aware of hazardous materials, how to store them properly, and how to protect themselves while using them.
6. Rules for the use of all District owned vessels, vehicles, (including but not limited to trucks, cars, boats, ATVs, UTVs, snow machines and motorcycles), aircraft, and personally owned vehicles when used for District business, to protect employees while operating these vehicles for District business.
7. Processes specific to District locations and facilities that may present unique safety concerns to inform employees of specific hazards when visiting unfamiliar work areas, such as substations, dams, generation facilities, or reservoirs.
8. A process for reporting workplace injuries, illnesses, and near misses to document and evaluate these events.
9. A root cause investigation process for all accidents, injuries and near misses of a serious nature to prevent reoccurrence, and to foster a "Culture of Safety" within the District.
10. A safety communication plan to communicate the importance of safety throughout the organization, including contractors and the public.
11. The formation of a Safety Steering Committee to review and continuously improve the District's Safety performance through monitoring, auditing and mitigating safety risks.
12. Procedures for dealing with safety emergencies during an event that provides safety guidance to employees, contractors and the public for facility evacuation, emergency response and assistance.
13. A safety suggestions process allowing employees to report safety risks or mitigations.

This plan shall allow for the anonymous submission of suggestions.

14. A recordkeeping and reporting process for tracking work related injuries or illnesses resulting in death; inpatient hospitalization; amputations; or eye loss involving any employees.
15. An incentive and discipline plan for encouraging positive safety performance and disciplining employees for malicious safety violations.
16. Procedures or guidance to evaluate conditions related to safety before work, on or near electric lines or equipment, has begun.

4.2 *APP Officer*

The General Manager is responsible for final approval of the APP, and shall designate the Safety Manager to implement the approved APP. Alternately, the General Manager may designate a Chief Safety Officer to approve and implement the APP.

4.3 *Independent access to General Manager and Board of Commissioners*

The Safety Manager, or the Chief Safety Officer if designated, shall have independent access to the General Manager and to the Board of Commissioners to address serious safety concerns at the highest levels of the organization.

4.4 *Independent Management of the Safety Policy and APP*

The Safety Manager shall work through the Safety Steering Committee to ensure the Safety Policy and APP is independent of conflicts of interest.

The Safety Manager will provide objective recommendations, advice and training on meeting safe working practices. This includes providing opinions and making comments on plans, procedures, processes, documentation, and controls. The Steering Committee shall review all safety activities, reports, risks, and recommendations. Recommendations are not binding unless approved by the Steering Committee, the General Manager or designee, or the Board.

4.5 *Safety Policy and APP Resources*

The Board of Commissioners and the General Manager are responsible to commit sufficient resources for the Safety Manager to implement the Safety Policy and APP. This includes office space, personnel, and an operating budget to meet the goals of the Safety Policy.

The Safety Manager, or Chief Safety Officer if designated, is responsible to set yearly work plans and budgets to implement the APP. Activities shall achieve the Safety Policy goals; encourage participation in regulatory outreach and training; and, sufficient consideration for accident or injury investigation, root-cause analysis, regulatory reporting, and compliance administration.

4.6 *Leadership Support and Engagement*

Senior management and IBEW Local 77 Union representation shall participate in the Safety

Steering Committee meetings to provide transparency and focus on implementing the Safety Policy and APP. The Steering Committee shall have a charter that defines its responsibilities and the membership for implementing the APP. The Steering Committee shall meet no less than monthly.

4.7 *Communications of the Safety Policy and APP*

The Safety Policy, APP, and relevant supporting APP documentation, shall be available to all employees and contract staffing. The Safety Manager shall make the APP and supporting documentation available on the District's Safety and Human Resources SharePoint site and through the District's learning management system for program transparency.

The District's Communications and Public Contracts Manager shall ensure all relevant contractors, vendors and third-parties are made aware of the Safety Policy, APP and supporting documents as appropriate for their role with the District.

4.8 *Safety Policy and APP Evaluation and Review*

The Safety Manager shall review the Safety Policy and APP as needed, but no less than annually. When a workplace injury or illness occurs, and a contributing root-cause factor includes the Safety Policy or APP, these documents shall be reviewed and modified as necessary. The Steering Committee shall review and endorse all major changes to the Safety Policy and APP. The General Manager or designee, and the Board of Commissioners, shall approve the documents as necessary.

The Safety Policy and APP reviews will focus on efficacy; meeting Core and Safety Policy goals; consistency with published guidance; and continued business needs. Errata changes to the Safety Policy do not require Board of Commissioners approval. Changes resulting from organizational realignment may be minor as long as they do not change the key principles and goals of the Safety Policy.

The Safety Manager is responsible to maintain a matrix of applicable Safety Standards that require reporting obligations.

4.9 *Safety Policy and APP Training*

The Safety Steering Committee shall ensure a Safety Training Plan is implemented to ensure all District employees and applicable contract staff are sufficiently trained in their roles and responsibilities under the APP. District staff that have specific responsibilities under the APP or supporting processes may have additional training relevant to their specific duties.

Contractors, vendors and third-parties may have specific duties related to safety depending on their function with the District. These individuals shall be made aware of the Safety Policy, APP and other supporting documentation. The District Safety Training Plan shall address guidance on determining the need for contractor, vendor and third party safety awareness.

The Safety Training Plan shall be sufficient to ensure the individuals' understanding of their responsibilities; including a validation of knowledge transfer.

4.10 *APP Compliance Monitoring and Audit*

The Safety Manager shall ensure processes are in place for the periodic self-monitoring of Safety under the APP. Monitoring mechanisms may include work related injury and illness reporting, performance assessments, compliance audits, spot checks, or other means to evaluate the efficacy of the APP. The Chief Compliance, Engineering and Technology Officer shall make recommendations for mitigations or improvements of deficiencies or risks.

APP auditing shall be completed at least annually based on perceived or actual risk and the need of the District. Third party audits may be used to evaluate technical safety issues, processes or concerns.

4.11 Safety Policy Accountability and Enforcement

The District encourages a strong “safety culture” through positive reinforcement. Non-bargaining employees shall have safety expectations integrated into their performance evaluations.

The General Manager, or designee, shall ensure there is a process to identify positive contributions by individuals and groups demonstrating exceptional efforts in meeting safety goals. The process should identify how the individual or group is recognized. Monetary awards, safety related gifts, letters of commendation, recognition by the Steering Committee, the General Manager, Board of Commissioners, or articles in District publications are some examples of recognition.

Willful neglect of safety rules or malicious safety violations are not tolerated under the Safety Policy. Individuals found to be willfully negligent, or malicious, in causing a workplace injury or illness are subject to discipline, up to and including termination. Contractors, vendors or third-parties found to be negligent or malicious in causing a safety incident will be removed from District property, and will be held accountable through their agreements. District employees who have been directly involved with willful or malicious violations shall NOT be permitted to participate in the Steering Committee.

Any employee can stop work if they feel their safety is compromised. The Safety Manager will immediately be contacted to address the issue, if it is to occur.

4.12 Safety Policy Internal Control Implementation

The Safety Manager and the Steering Committee shall ensure specific procedures, processes, guidance or controls are developed and implemented to support the Safety Policy. This will include clear procedures to self-report all safety incidents that result in work related injury or illness, no matter how minor, and near misses.

The Safety Manager and Steering Committee will focus on the importance to integrate safety practices with work activities and tasks. This ensures safety is addressed throughout the process to reduce risk, and not a series of general rules. Elements of procedures, processes, guidance and controls will include prevention of accidents, the detection of safety risks when observed, and correcting all safety deficiencies identified. Process review and improvement shall be inherent to all processes to ensure efficiency, and continued risk reduction.

Procedures, processes, guidance and controls shall be reviewed regularly for efficacy and continuous improvement. The Safety Manager may help supervisors develop and review

procedures involving safety risks or mitigations as part of incorporating safety into the processes.

4.13 *Safety Risk Assessments and Metrics*

The Safety Manager and the Steering Committee shall be responsible to develop processes to evaluate the risks of workplace injuries and illnesses. This includes identifying metrics to measure success. The safety risk assessments shall consider the District's likelihood that any injury or illness can occur when performing a work activity and the severity of the injury or illness. Metrics shall be meaningful and measurable, leading to further mitigate risk strategies.

Risk assessments shall be completed at least annually. With the introduction of new processes, procedures, or equipment a risk assessment shall be completed. The results shall be used to prioritize resources, safety monitoring activities, and implement or improve procedures, processes, guidance or controls.

4.14 *Measurable Safety Performance Targets*

In addition to measurable safety metrics, the Steering Committee shall develop and monitor measurable performance targets for the Safety Policy. These targets shall be set at the beginning of each calendar year and help to determine if the District has met its goals. In some cases, performance targets can include benchmarks and milestones for activities that occur on a frequent basis.

Performance targets are annually reviewed to ensure they are meaningful and appropriate. The Steering Committee may change these targets to ensure full implementation of the Safety Policy and APP.

4.15 *Communications & Coordination of the Safety Policy*

The Safety Manager and the Steering Committee shall develop a communications and coordination plan to continuously support the Safety Policy and help ensure a strong "safety culture". The plan will consider all District staff, locations, work schedules, and individual responsibilities. Communications and coordination efforts shall focus on specific areas of the District and job responsibilities. Safety incidents may require additional communications.

The Safety Manager is the primary contact for District safety matters with Washington State L&I, and other regulators.

4.16 *Reporting of Workplace Injuries and Illnesses*

The Safety Manager is responsible for collecting and initiating the investigation of reported workplace injuries, illnesses and near misses. The Steering Committee will review all reports at the next meeting, along with the progress of related investigations or mitigations.

All employees and contractors are responsible to report on all injuries, accidents and near misses, no matter how insignificant they may seem at the time. Employees can make the reports directly to their foreman supervisor, or the Safety Manager.

The Safety Manager shall maintain records of these reports consistent with L&I or other regulatory requirements. Related investigations and mitigations require written reports to close out the incidents.

5 Document Management

5.1 Recordkeeping

The Safety Manager shall be responsible to ensure relevant Safety Policy and related documentation is organized and maintained.

5.2 Review Period

The Safety Manager shall ensure this policy is reviewed and updated based on the District's needs

6 Version History

Rev.	Date	Change Description	By
0	07/30/2019	Initial version	Kevin Conway, Chief Compliance, Engineering and Technology Officer
1	10/6/2020	Annual review and revision	Adam Wiltse, Safety Manager