

St. David's Center for Child and Family Development

AWAIR Program

In compliance with MNOSHA – 2015. Updated 2017.

Safety Goals and Objectives

St. David's Center is committed to providing its employees with a safe and healthy work environment. To achieve this environment the company has set forth goals and objectives to be accomplished on a yearly basis.

St. David's Center has the following safety goals for the 2017 calendar year:

Goal #1: Continue to maintain or reduce the percentages of employees who are injured with a tenure of one year or less. From 1/1/2014 to 12/31/2014, SDC employee injuries with a tenure or less was 50.84%. From 1/1/2015 to 12/31/2015, this dropped to 40.48%. From 1/1/2016 to 12/31/2016, this rate was 28.79%.

Goal #2 Continue to maintain or reduce the percentage of employees who experience injuries caused by student/client interactions. From 1/1/2014 to 12/31/2014, SDC employee injuries caused by client/patient interactions 50.84%. From 1/1/2015 to 12/31/2015, this dropped to 46.43%. From 1/1/2016 to 12/31/2016, this rate was 42.42%.

(These goals are closely interconnected as many of our employees with a tenure under 1 year experience workplace injuries related to clients or students.).

Objective: In 2017, St. David's Center will partner with SFM to pilot training called Play with Purpose in the Autism Day Treatment and Pediatric Therapy programs as they have high rates of employee workplace injuries. The Policy, Training, and Talent (PTT) team along with the Safety and Infection Control Committee and SFM will collaborate with program leaders to identify work safety practices for employees when engaging with students and clients. Employees, both current and existing in these programs, will then be trained at program meetings and/or other scheduled training. The Policy, Training, and Talent team will also collaborate with the Behavior Management and Safety Training Instructor to determine how and when Play with Purpose may be added to the CPI training sessions.

Goal #3 Continue to maintain or reduce the percentage of employees injured by ice/snow related incidents. From 1/1/2014 to 12/31/2014, SDC employee injuries caused by ice/snow related incidents was 10.16%. From 1/1/2015 to 12/31/2015, this dropped to 2.38%. From 1/1/2016 to 12/31/2016, this rate was 1.52%.

Objective: Maintain snow removal and salting record keeping system to determine if further snow/ice removal efforts are necessary. Increase employee awareness about the hazards of winter conditions and implement initial and reminder training for all employees. Supervisors of community program employees will also remind such employees of the hazards of winter conditions especially in community and homes where SDC does not have control over snow/ice removal.

Goal #4: Develop an Emergency Procedures Booklet for our St. Louis Park location by mid 2017.

Objective: The Safety and Infection Control Committee will work to develop a written Emergency Procedures booklet that outlines how employees should respond in various emergency situations. The Safety and Infection Control Committee will partner with leaders at the St. Louis Park site and may model the booklet after the Minnetonka Emergency Procedures booklet.

Goal #5: Continue to monitor the safety and preventative maintenance needs for St. Louis Park and the Autism Day Treatment Community site.

Objective: The Safety and Infection Control Committee will partner with the Facilities team to determine if a written Preventative Maintenance Plan for both the St. Louis Park and Autism Day Treatment Community sites would be necessary and useful at this time.

Goal #6: Begin planning for the safety and maintenance needs for the newly opening location at Westminster Presbyterian in Minneapolis.

Objective: As St. David's Center begins thorough and thoughtful planning regarding the space and development of our location at Westminster, the Safety and Infection Control Committee will be mindful in the approach and development of the safety and maintenance needs and processes for this location.

St. David's Center for Child and Family Development (SDC) is committed to the safety and health of our employees, who are our most valuable asset. This policy and program serves as guide to succeed in meeting our health and safety commitment and goals. The requirements set forth by this policy and program meet the requirements of the Minnesota AWAIR act.

Statement of Policy

As the management representing SDC the following principles will guide the application and performance of our safety program. Safety responsibility begins at the top and progresses outward through all levels of our workforce.

It is a shared responsibility with each of us taking a proactive approach towards accident prevention. The safety of our employees, interns, volunteers, clients, students, families, and organizational operations will take precedence over expediency or short-cuts.

Our work starts at the planning phase of each operation with controls implemented at each anticipated hazard as shown by task analysis before actual exposure exists. It is irresponsible to allow the evolution of a hazard and we make every effort to discover a hazard before injury ensues.

Assignment of Responsibility

The keystone of maintaining a safe and healthful workplace relies on the accountability of all employees regardless of position. To help understand employee responsibility, the duties of each of SDC employee are outlined in the Workplace Safety Policies.

Executive Leadership

The leadership executives of SDC by reason of their position of organizational authority will share the responsibilities of SDC's safety activities. They will assign permission to health and safety coordinators, the Safety and Infection Control Committee, and supervisors to implement and maintain safety and health programs.

Rationale and duties include, but are not limited to:

- To promote the importance of health and safety to the organization at all levels.
- To allocate adequate resources including funds, time, and energy with regard to safety (safety training) and enforcing the implementation of all safety policies.
- Communicate with employees that efforts to minimize accidents and injuries on the job are a top priority and will be considered part of job performance.

Health and Safety Coordinator(s)

Though safety is a shared responsibility, the responsibilities of coordinating SDC's employee safety activities is assigned to the Human Resources Generalist and Behavior Management and Safety Training Instructor with supervision from the Human Resources Manager, the Safety and Infection Control Committee, and the Executive Leadership team.

Such duties include, but are not limited to:

- Supervise, coordinate, and evaluate all employee accident/injury analyses.
- Maintain and analyze employee accident/injury records.
- Develop employee safety related education programs.
- Act as the SDC representative in dealing with regulatory agencies and advise on implementation of projected legislation and recommend action where appropriate.
- Maintain outside professional contacts and exchange any information with others to keep the Health and Safety Program up to date and effective.
- Conduct safety related training for supervisors and employees.
- Enforce all company safety and health programs, policies, and rules through the application of appropriate disciplinary procedures.
- Develop relevant safety talks, and keep the Executive leadership team informed as to the status of the company Safety and Health programs.

Safety and Infection Control Committee

The Safety and Infection Control Committee members of SDC by reason of their position will share the responsibilities of the organization's safety activities. They will act to implement and maintain safety and health programs under supervision of the Executive Leadership Team. Safety and Infection Control Committee members' duties include, but are not limited to:

- Conduct monthly meetings to review accident reports, identify hazards, and address any and all safety concerns raised by employees, first-line supervision, or the safety coordinators.
- Review the AWAIR program at least annually and make recommendations concerning updates and revisions to the program to senior management and the safety coordinators.
- Represent their particular work area and program and therefore should address all safety concerns brought to them by their coworkers and supervisees. These concerns should be handled by initially investigating the issue with the area supervisor to determine if the concern is valid and then, as necessary and appropriate, bring the issue to the safety coordinator or the full Safety Committee.
- Conduct safety related training for supervisors and employees.
- Enforce all company safety and health programs, policies, and rules through the application of appropriate disciplinary procedures.
- Assist in developing relevant safety talks, and keep the Executive Leadership team informed as to the status of the company Safety and Health programs as needed.
- Assist in conducting required safety meetings and discuss safety with employees as needed.

Supervisors

SDC supervisors by reason of their position will share the responsibilities of the organization's safety activities. They will act to implement and maintain safety and health programs. Supervisory duties include, but are not limited to:

- Inspect and enforce compliance with safe work practices and company rules and utilizing appropriate protective equipment if necessary.
- Train employees to work safely.
- Supervisors are responsible for the safety of their program's employees.

- Act responsibly in emergencies according to the established procedures in case of fire or injury.
- Report and investigate accidents and correct the causes of accidents.
- Aid in conducting required safety meetings and discuss safety with employees as needed.
- Develop appropriate work for employees with restricted work duties.

Employees

Each employee is expected as a condition of employment for which they are paid to work in a manner which will not inflict self-injury or cause injury to themselves and to fellow workers. It is important that each employee understand that the responsibility for his or her safety is an integral part of a job assignment.

- Each employee will make themselves familiar with organization policies and emergency procedures.
- Report unsafe conditions and practices.
- Observe safety rules and regulations.
- Use proper tools and appropriate equipment when the job requires it.
- Make safety suggestions.
- Be aware of what emergency number to call in case of fire or other emergencies.
- Refrain from undertaking jobs they do not understand or have not been trained to do.
- Cooperate with safety inspections.
- Leave work areas neat and organized.
- Consider work activities to determine if they are truly necessary to adequately fulfill work duties/functions and refrain from such an activity if it poses unnecessary risk for injury.

Identifying, Analyzing, and Controlling New or Existing Hazards

Consistent with the SDC policies, the organization will analyze potential hazards to effectively minimize accidents and injuries. To that end, workplace conditions and employee work practices will be reviewed for hazard potential. Employee work practices will be monitored by supervisors and department heads when reviewing job descriptions. Workplace conditions and inspections will be managed by the Facilities team as under their preventative maintenance plan. Two times a year an outside consultant from SFM may assist the Facilities Manager and Safety and Infection Control Committee members in the Preventative Maintenance plan walk through. Every three months a member of facilities team will inspect the entire facility per the preventative maintenance plan schedule.

All work activities are to be evaluated to identify any potential and inherent hazards, both physical and environmental. Noted deficiencies and hazards are to be documented for correction and prioritized based upon severity to develop procedures and training programs relevant to the work operation. Once established, adherence to these procedures and programs will be stated as a condition of employment. Specific safety and health hazards must be identified based on the type and scope of the work being performed and a system must be used to correct identified hazards before they result in an accident or illness. This can be accomplished using one of the four prioritized methods of abatement in the order stated below:

- Eliminate the hazard

- Engineering controls
- Administrative controls
- Personal Protective Equipment

Note: Specific site safety rules, when necessary to perform duties under conditions not addressed by the general safety rules and operating procedures will be addressed as an addendum to the general program.

Work Practices

The Health and Safety Coordinator(s) will review work practices of respective employees if necessary and report and discuss their findings at the safety meetings if necessary. Employees who practice unsafe work practices will be approached by their supervisor or coordinator and be expected to change or modify their work practice immediately. Failure to do so will result in disciplinary action. SDC employees are strongly encouraged to immediately report any unsafe work practices or conditions to their supervisors.

Work Operations

A primary function of this organization is to provide safe working conditions and environments so that SDC employees may carry out the organization's mission. This includes but is not limited to complying with the following work rules. All SDC employees are expected to be familiar with and abide by all of the following work rules. Failure to comply with any safety rule will be cause for disciplinary action up to, and including, termination.

- Always report any injuries or accidents to your supervisor. All injuries should be treated as soon as possible. Report unsafe work practices or hazards immediately.
- All employees must wear personal protective equipment such as gloves, lab coats, respirators, etc. when they are performing activities that require such protection.
- Employees must adhere to the dress code and grooming standards per the employee handbook.
- Do not remove any safety guard from any equipment. Do not operate any equipment without a safety guard if there is one.
- Practical jokes and horseplay can lead to accidents and will not be tolerated. Never distract the attention of another employee.
- Obey all warning tags and signs posted throughout the facility or affixed to equipment.
- Pay careful attention to lifting or pushing heavy objects. Avoid unnecessary injuries by practicing the following ergonomic rules:
 - Be sure to have good footing, and lift with a smooth and even motion. Do not jerk or twist a heavy load that you are bearing.
 - Never lift while in an awkward position. Do not twist when lifting. Always center a heavy load or child and use both arms to carry them. Do not place a child or heavy load on hip.
 - Keep head up when lifting or carrying a heavy object.
 - Be aware of surroundings.
 - Walk slowly in the winter to avoid slipping on icy walkways.
 - Know where fire extinguishers are located.
 - Keep all areas neat, orderly, and free from trash and debris.

- Check the condition of equipment and space including office, classroom, and treatment/therapy rooms. Never attempt to make repairs unless it is part of your job functions.

Training and Communications

SDC will communicate this AWAIR plan to its employees. Communication from employees regarding safe work conditions and all practices will also go through their immediate supervisor, the Safety and Infection Control Committee members, or directly to the Safety Coordinator. This communication system will be explained to all employees with a sign-off form of documentation.

Training

Safety education of all employees from supervisors to new employees will be conducted throughout all phases of work performed for SDC.

Supervisors are responsible for ensuring that the employees working under them are adequately trained and equipped with appropriate PPE if necessary to perform all job tasks safely and will maintain records of employee training to ensure that we have qualified employees to perform the work that is needed to be done.

Training programs will be based on clearly defined objectives that determine the scope of training and guide the selection and preparation of training materials.

Specialized training programs and policies include but are not limited to:

- Blood Borne Pathogen Procedure and Universal Precautions
- Ergonomic Basics
- Winter Hazards: Preventing slips, trips, and falls
- Accidents and Critical Incidents – Emergency Response and Reporting
- Administration of Diastat
- Administration of Epinephrine Auto-injector
- Cleaning and Sanitation
- Client Safety and Campus Security
- Client Safety (Community Based)
- Code Status
- Emergency Response Reporting and Review
- First Aid Administration
- Sentinel Events
- Vulnerable Individuals Policy
- Workplace Safety
- Work Related Injuries

Such programs may be presented at the following:

- New Hire Orientation
- Program Training and Orientation

- When new equipment or processes are introduced or when procedures have been updated or revised
- When new information must be made available
- When employee performance needs improvement
- Annually to reinforce previous training and to comply with applicable standards
- Special training to accommodate site specific safety hazards

Accident analyses are to include procedures for the recording and reporting of incidents in accordance with OSHA requirements. If necessary, analysis procedures for job related accidents and illnesses may be conducted to determine possible causes and include an emergency response plan that sets forth procedures to be followed upon the occurrence of wounds, injuries, fatalities, or other emergencies. These procedures may include those of the administration of first aid and or other necessary medical treatment.

The Safety Coordinator and Safety and Infection Control Committee will provide the direction and motivation to ensure that supervisors conduct work group safety meetings through the presentation of relative topics, and feedback/reinforcement based on Safety and Infection Control committee meetings and other inspections.

Safety and Health Programs

- Accidents and Critical Incidents – Emergency Response and Reporting
- Administration of Diastat
- Administration of Epinephrine Auto-injector
- Cleaning and Sanitation
- Client Safety and Campus Security Policy
- Client Safety (Community Based)
- Code Status
- Emergency Response Reporting and Review
- First Aid Administration
- Sentinel Events
- Vulnerable Individuals Policy

Safety and Infection Control Committee Participation

All employees will receive information and be given the opportunity to participate in the SDC Safety Committee. Information will be periodically shared to garner interest and support for safety initiatives.

Accident Reporting, Analysis, and Record Keeping

The following are basic safety rules by which all SDC employees must follow. If additional rules are required a supervisor or safety coordinator will issue instructions. Compliance with these rules is necessary to help prevent injury.

In the event of an accident or injury, the procedures must be followed

- Serious injury
 - Staff will provide emergency first aid following instructions received during training.
 - Summon additional staff, if they are immediately available, to assist in providing emergency first aid or seeking emergency medical care.
 - Seek medical attention, including calling 911 for emergency medical care, as soon as possible.
- Incidence or accident during the course of treatment or participation in intervention program:
 - Assess level of injury and provide first aid/care as needed.
 - Consult with program lead/supervisor or seek assistance from other staff to assess and support managing the injury and ability to continue to participate in services.
 - Notify and consult with parent if available
 - Complete accident/incident report as indicated
- Medical emergency, unexpected serious illness, or significant unexpected change in an illness or medical condition
 - Assess if the person requires the program to call 911, seek physician treatment, or hospitalization.
 - When staff believes that a person is experiencing a life threatening medical emergency they must immediately call 911.
 - Staff will provide emergency first aid as trained or directed until further emergency medical care arrives at the program or the person is taken to a physician or hospital for treatment.

Accident analysis is one means used to prevent accidents. As such, the analysis must produce information that leads to counter measures, which prevent or reduce the number of accidents. The more complete the information, the easier it will be for the organization to design effective countermeasures. For this reason, accident prevention analyses must be fact-finding, not fault findings; otherwise they may do more harm than good.

This is not say that responsibility may not be fixed where personal failure has caused injury, or that such persons should not be excused from the consequences of their actions. What this does mean is that the investigation itself should be concerned only with facts.

The analyzing individuals should always be totally impartial and kept free from the punitive aspects of their investigation so they can concentrate all of their efforts in uncovering all the facts regarding the accident. Remember too, that accidents rarely have only one cause. Look carefully over the entire work operation itemizing each step to find weaknesses or hidden hazards in our work operations. An accident that causes death or serious injury must be thoroughly investigated.

Reporting

Every SDC employee who is involved in an accident or is injured during work must promptly report the incident to his/her supervisor. Any accident or injury, no matter how minor, must be reported. This will establish written documentation in the event that a perceived minor incident develops into something more serious.

First Report of Injury forms must be filled out accurately and completely in order to:

- Provide the best-written account of the accident for possible insurance/compensation efforts.
- Accurately investigate the accident to minimize passivity of re-occurrence.
- Correctly assess what accidents are “recordable” as per OSHA requirements.

The health and safety coordinator or other assigned personnel will be able to answer any questions regarding the accident/injury form.

Reporting Procedures

- Completing a report
 - Incident reports will be completed as soon possible after the occurrence, but no later than 24 hours after the incident occurred or the program became aware of the occurrence. The written report will include:
 - The name of the person or persons involved in the incident
 - The date, time, and location of the incident
 - A description of the incident
 - A description of the response to the incident and whether a person’s coordinated service and support plan addendum or program policies and procedures were implemented as applicable
 - The name of the staff person or persons who responded to the incident.
 - The results of the incident review
 - When the incident involves more than one person, this program will not disclose personally identifiable information about any other person when making the report to the legal representative or designated emergency contact and case manager, unless this program has consent of the person. The written report will not contain the name or initials of the other person(s) involved in the incident.

Recordkeeping

All accident/injury records will be kept by SDC and will be used to comply with OSHA accident summary regulations and other regulatory agencies to help assess the effectiveness of SDC’s accident reduction efforts.

Investigation and Analysis

If deemed necessary, every accident may be analyzed to define the cause of the accident and the steps needed to prevent a recurrence. The Health and Safety Coordinator will be responsible for timely accident analysis. Supervisors may be asked to assist in this investigation. The SDC Safety and Infection Control Committee will review results of the investigation and any recommendations will be forwarded to the appropriate personnel for implementation.

The investigation of all accidents and near misses is the responsibility of all levels of management and a concern for every employee within the organization. The site supervisor’s unique position gives him or her special priority and responsibility for this function, and they should participate in all investigations that occur within their shift supervision.

Accident Protocol and Procedures

Before doing anything else, ensure that each employee receives prompt first aid treatment for all injuries.

Take any emergency action necessary to minimize the extent of loss to both employees and property when a serious accident occurs.

In cases of employee error, corrective action taken in a manner of telling the employees to work more carefully will not be accepted as a means of correcting the cause of the accident.

If an analysis is deemed necessary, it should be made as soon as possible. A delay of only a few hours may permit important evidence to be destroyed or removed, intentionally or unintentionally. Also the results of the inquiry should be known quickly insomuch as their publicity value in the safety education of employees and supervisors is greatly increased by promptness.

If you see an accident make a mental note of everything that occurred and the condition that existed before the accident and ask yourself these questions:

- Where were others when the accident happened?
- What was I doing?
- What equipment was involved?
- Where was the injured person and what work was being done?
- What was the sequence of events?

Imprint these things on your memory. Remember that others were in a different position and may not have seen things as you did. Try to document as much as possible using information gathered by and from witnesses, and as soon as possible while the events are fresh in their minds. Cooperate fully with all regulatory agencies conducting investigations of the accident or incident. No statement regarding accident liability will be made by anyone connected with the organization. Take part in meeting with supervisors to review safety and loss control policies or procedures that need to be developed or upgraded.

Cooperation in Investigation and Analysis

When the investigator asks questions about the accident, give the facts as you know them. If you move or change information to protect someone how can we accurately determine the cause and help prevent the same thing from happening again? Next time you may be the victim.

The Causes of Accidents

Since a chain reaction of events often causes an accident, it is useful to analyze the sequence of events that preceded accidents in order to avoid the same mistakes in the future.

Unsafe practices and conditions that cause accidents may include:

- Inadequate design standards
- Inadequate or improper work process or standards
- Inadequate purchasing standards

- Normal wear and tear or abnormal use of equipment or supplies
- Inadequate maintenance standards

Unsafe practices and conditions caused by people may include:

- Lack of information
- Improper or inadequate motivation
- Lack of skill or proficiency
- Physical problems or incapacity
- Mental problems or incapacity
- Emotional problems or incapacity

Inadequate management may take several forms:

- Inadequate loss control program. The scope does not adequately cover the risks.
- Inadequate program standards. The standards are vague or incomplete.
- Inadequate compliance with standards.
- Supervisors are not properly educating or motivating employees about the standards or are not properly enforcing the standards.

Substandard practices include:

- Operating equipment without authority
- Horseplay
- Failing to warn of danger
- Being under the influence of drugs or alcohol
- Removal of safety devices
- Inadequate or improper use of personal protective equipment
- Use of defective equipment
- Use of defective tools, equipment, or materials
- Using equipment improperly
- Congestion or restrictive movement
- Inadequate warning systems
- Improper lifting
- High or low temperature
- Improper positioning for task exposure
- Inadequate lighting
- Servicing or adjusting of equipment while in operation
- Failure to comply with safety policies and emergency procedures

Disciplinary Procedures

SDC management accepts its responsibility to provide a safe workplace for all employees. There are also responsibilities of all employees and one of these is to obey all safety rules and to work in such a manner as to prevent injury to themselves or fellow employees.

SDC's intent is not to discipline employees who are involved in non-preventable accidents. Our position is to work with all employees toward making them safer workers. Disciplinary procedures are established to deal with any employees who disregard SDC policies and rules, or who are repeatedly negligent in their duties. Our procedures are set up first to counsel, then proceed with the disciplinary procedures if necessary. SDC cannot and will not permit negligent employees to repeatedly injure themselves or to put their fellow employees in danger.

Should there be a violation of safety rules or policies, the Progressive Discipline policy will apply as follows:

- The first step in all supervisory relationships is to have deliberate development/coaching with the employee. This step is to build accountability with the employee and provide feedback on behaviors or performance concerns. The supervisor shall document the coaching and include it in the employee's personnel file.
- The next step is to follow a Performance Improvement Plan (PIP) when there is a pattern of failure to follow a policy, poor attendance or unprofessional behavior which has not been adjusted through coaching/development. The PIP shall be documented and included in the employee's personnel file.
- The last step is the Final Corrective Action Plan which should be completed by the supervisor that includes observed problem behavior and previous discussion information, the impact this behavior is having on the team/position, the expected behavior from the employee, and the goals and timeline to follow. The employee should review this form and have sufficient time to make any additional comments to the form. The employee and supervisor will sign this form and it will be included in the employee's personnel file.
- The progressive performance disciplinary process outlined above will apply in most circumstances, but in no way prevents St. David's Center from taking immediate employment action, up to and including termination of employment, where appropriate. This policy does not alter the at-will employment relationship between St. David's Center and its employees, which means that the employment relationship may be terminated at any time for any reason not prohibited by law.

In each case of safety violation, the employee will be made aware of their offense. Documentation of the safety violation will also be placed in the employee's personnel file.

When issuing a safety violation notice, the Safety Coordinator and employee supervisor will meet with the employee(s) to discuss the safety violation. The employee will be informed of the rule/regulation that was violated and the corrective action to be taken.

The disciplinary policy is based on violations of safety rules or policies over a three-year period. This policy does not prohibit dismissal or removal from the job site of employees whose conduct constitutes as serious and flagrant violation, which could cause danger to himself/herself, coworkers, clients, students, property, or equipment.

Annual Review of AWAIR

Provisions will be made for an annual review of this and other related programs to ensure that the program elements meet the scope and purpose of SDC's safety and health programs.