



OPERATIONS & SAFETY COMMITTEE
THURSDAY, JANUARY 23, 2014, 11:00 A.M.
OMNITRANS METRO FACILITY
1700 WEST 5TH STREET
SAN BERNARDINO, CA 92411

The meeting facility is accessible to persons with disabilities. If assistive listening devices or other auxiliary aids or services are needed in order to participate in the public meeting, requests should be made through the Recording Secretary at least three (3) business days prior to the Committee Meeting. The Recording Secretary's telephone number is 909-379-7110 (voice) or 909-384-9351 (TTY), located at 1700 West Fifth Street, San Bernardino, California. If you have comments about items on the agenda or other general concerns and are not able to attend the meeting, please mail them to Omnitrans at 1700 West Fifth Street, San Bernardino, California, Attention Board Secretary. Comments may also be submitted by email to BoardSecretary@omnitrans.org.

A. CALL TO ORDER

B. ANNOUNCEMENTS/PRESENTATIONS

1. Next Committee Meeting: Not scheduled at this time.

C. COMMUNICATIONS FROM THE PUBLIC

This is the time and place for the general public to address the Board for items that are not on the agenda. In accordance with rules applicable to meetings of the Plans & Programs Committee, comments on items not on the agenda and on items on the agenda are to be limited to a total of three (3) minutes per individual.

D. POSSIBLE CONFLICTS OF INTEREST ISSUES

Disclosure – Note agenda items contractors, subcontractors and agents, which may require member abstentions due to conflict of interest and financial interests. Board Member abstentions shall be stated under this item for recordation in the appropriate item.

N/A

E. DISCUSSION ITEMS

1. Recommend to Board of Directors, Adoption of Proposed Revisions to Personnel Policy #802, Employee Injury and Illness Prevention and Personnel Policy #803, Work Place and Transit System Security
2. Operations Safety & Security Informational Brief - Presentation
3. Set Next Operations & Safety Committee Meeting

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1700 W. Fifth St.
San Bernardino, CA 92411
909-379-7100
www.omnitrans.org

ITEM # E1

DATE: January 23, 2014

TO: Committee Chair Sam Spagnolo and
Members of the Operations and Safety Committee

THROUGH: P. Scott Graham, Interim CEO/General Manager

FROM: Marjorie Ewing, Director of Human Resources

SUBJECT: **REVISIONS TO PERSONNEL POLICY #802, EMPLOYEE INJURY
AND ILLNESS PREVENTION AND PERSONNEL POLICY #803,
WORK PLACE AND TRANSIT SYSTEM SECURITY**

FORM MOTION

Recommend to the Board of Directors, adoption of proposed changes to Personnel Policy #802, Employee Injury and Illness Prevention Program, and Personnel Policy #803, Work Place and Transit System Security, effective February 5, 2014.

BACKGROUND

At a recent Occupational Safety and Health Administration (OSHA) training, it was strongly recommended that organizations review policies on Employee Injury and Illness Prevention Program (IIPP) and Work Place and Transit System Security on an annual basis. This recommendation is to ensure that the policies do not create a larger than necessary compliance liability by including areas of exposure in the policies that are not required.

Omnitrans has two policies, Personnel Policy #802, Employee Injury and Illness Prevention, and Personnel Policy #803, Work Place and Transit System Security, that have not been updated since 2010. As a result of OSHA's recommendation, staff is recommending changes to both policies, as shown in the attached redlined version. These recommendations are made as a result of reviewing the California Code of Regulations, Title 8, General Industry Safety Orders, Section 3203, as well as the Federal Department of Homeland Security, Federal Transportation Security Administration (TSA) guidelines, policies and regulations.

FUNDING SOURCE

There are no increased costs associated with the recommended action.

_____ Verification of Funding Source and Availability of Funds.
(Verified and initial by Finance)

CONCLUSION

Adoption of the proposed changes to Personnel Policy #802, Employee Injury and Illness Prevention Program, and Policy #803, Work Place and Transit System Security, will streamline the Agency's compliance requirements without additional exposure.

PSG:ME

Attachments



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SUBJECT

Employee Injury and Illness Prevention Program

APPROVED BY OMNITRANS
BOARD OF DIRECTORS

DATE: April 7, 2010

I. Purpose

To state Omnitrans' policy on Illness and Injury Prevention.

II. Scope

All Departments

III. Procedure

- A. This formal Injury and Illness Prevention Program (IIPP) has been created in order to standardize all the various safety and health policies and procedures into one effective, uniform program in compliance with the California Code of Regulations, Title 8 General Industry Safety Orders, Section 3203. Accidents involving bodily injury to Omnitrans employees, or which result in property damage can have a substantial detrimental impact on assets or public service. The Agency also has a moral and legal responsibility to provide and maintain a safe and healthful operation.
- B. This Injury and Illness Prevention Program has been designed to meet the specific needs of Omnitrans; it is intended to be both practical and effective.
- C. Ancillary programs covered by the IIPP include environmental health and employee security as is related to employee exposure and protection requirements and guidelines.
- D. As conditions warrant, modifications and additions will be made. Comments and suggestions from all personnel will continue to be welcome. However, until revised, it is expected that these procedures will be followed.

IV. Objectives

- A. To provide safe and healthful working conditions for all employees.
- B. To promote better employee morale and pride.
- C. To improve performance, service and efficiency.
- D. To reduce the direct and indirect costs of injuries and illnesses.

V. Program Authority & Responsibility

- A. ~~The Omnitrans Safety & Regulatory Compliance Manager under the direction of the CEO/General Manager or designee has the responsibility for the implementation and administration of the Injury and Illness Prevention Program.~~ The Injury and Illness Prevention Program (IIP Program) administrator is the CEO/General Manager. The



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Program Administrator has the authority and responsibility for implementing the provisions of this program for Omnitrans.

- ~~B. The Fleet Safety Program is administered by the Fleet Safety and Training Supervisor under the direction of the Director of Operations.~~
- ~~C. The CEO/General Manager, under the direction of the Board of Directors, has the responsibility and authority to make substantive changes in the program.~~
- B. All directors, managers and supervisors are responsible for implementing and maintaining the IIP Program in their work areas and for answering worker questions about the IIP Program. A copy of this IIP Program is available from each manager and supervisor.

VI. Responsibilities

A. Omnitrans Management Responsibilities

- ~~1. The success of our Injury and Illness Prevention Program will be achieved—and maintained with the active interest and participation by all Omnitrans personnel. Omnitrans Management will plan, organize and administer the safety and health program by enforcing established policy, setting goals and objectives, assigning responsibility, motivating employees and monitoring program results.~~
- ~~2. Omnitrans Management will support and maintain the Injury and Illness Prevention Program by carrying out the following responsibilities:~~
 - ~~a. Provide leadership and direction to all Agency employees and contractors.~~
 - ~~b. Ensure adequate financial support for the safety, health and environmental compliance program.~~
 - ~~c. Hold each Supervisor accountable for implementation and consistent application of all safety policies and procedures within their Departments.~~
 - ~~d. Ensure active employee involvement in safety, health and environmental concerns through the establishment of effective recognition systems, protect all employees from harassment for reporting safety problems, and enforce established disciplinary procedures to address safety matters.~~
 - ~~e. Consistently reinforce the Agency's commitment to injury and illness prevention through development of comprehensive communication and awareness programs.~~
 - ~~f. Establish annual management goals and programs focused toward the~~



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~~reduction of employee occupational injuries and illnesses.~~

~~g. Audit and evaluate management performance in achieving Injury and Illness Prevention Program objectives.~~

B. Safety and Security Office Responsibilities:

- ~~1. Coordinate the activities of the Injury and Illness Prevention Program.~~
- ~~2. Act as a liaison between management and outside safety and health compliance agencies.~~
- ~~3. Establish minimum safety standards, safe work procedures, safety rules and regulations.~~
- ~~4. Create a system for communicating with all employees on matters relating to safety and health. This system shall consist of the following activities:
 - ~~a. Employee Safety Awareness Meetings.~~
 - ~~b. Formal safety, health, and environmental compliance training.~~
 - ~~c. Postings of safety rules, safe work procedures, inspection results, and other safety awareness related materials.~~~~
- ~~5. Coordinate/conduct periodic safety inspections to identify unsafe/unhealthful conditions and unsafe work practices.~~
- ~~6. In addition to the periodic inspections, coordinate supplemental inspections whenever:
 - ~~a. New processes, equipment or substances are introduced into the workplace.~~
 - ~~b. New or previously unrecognized hazards are identified.~~
 - ~~c. Previous inspections have generated corrective action with pending completion dates that require follow up until actual completion has been accomplished.~~~~
- ~~7. Establish safety priority classifications for inspection report items to assist Agency departments and scheduling appropriate corrective action as required.~~
- ~~8. Verify that corrective measures are completed in a timely fashion for any hazards identified.~~
- ~~9. Review all injury and illness investigation reports and verify that corrective actions~~



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~~have been completed, as required to prevent recurrence.~~

- ~~10. Conduct reviews of injury and illness reports, injury and illness logs, and insurance company claims reports to determine if significant accident trends are beginning to develop at the Agency.~~
- ~~11. Establish safety and health training programs for:
 - a. New employees.
 - b. Employees assigned new job/task assignments for which safety training has not been provided.
 - c. New substances, processes, procedures, or equipment introduced into the workplace that represent a new hazard.
 - d. Any new or previously unrecognized hazard.
 - e. Supervisors to familiarize them with the safety and health hazards to which employees under their immediate direction and control may be exposed.~~
- ~~12. Implement the Hazard Communication Program, Emergency Management Plan, Fire Prevention Plan, Hazardous Waste Minimization and Control Program, and any other programs or plans required by local, state, and federal safety compliance agencies.~~
- ~~13. Verify that Emergency Phone Numbers and Emergency Action Plan Information and Instructions have been posted and checked for accuracy.~~
- ~~14. Ensure that required safety, health, and other employee notices are posted and current.~~
- ~~15. Ensure that adequate first-aid and other emergency supplies are maintained at all Agency facilities.~~
- ~~16. Coordinate, track, and verify completion of safety recommendations issued by the insurance carrier, or safety, health, and environmental regulatory compliance agencies.~~
- ~~17. Ensure that all CAL-OSHA record keeping and accident reporting requirements are maintained by the Agency.~~
- ~~18. Monitor and advise management on the development of new safety, health, and environmental laws to ensure timely compliance by the Agency.~~



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C. Directors' and Managers' Responsibilities

- ~~1. Familiarize themselves with the Injury and Illness Prevention Program and ensure its effective implementation within their Departments.~~
- ~~2. Be aware of all safety, health, and environmental compliance requirements when introducing a new process, procedure, equipment or material to the Agency.~~
- ~~3. Give maximum support to all programs and policies whose function is to promote safety, health, and environmental compliance.~~
- ~~4. Actively participate in safety, health, and environmental compliance program activities as required.~~
- ~~5. Investigate and review serious occupational injuries and illnesses to ensure that proper reports are completed and appropriate action is taken to prevent recurrence.~~
- ~~6. Ensure that prompt and appropriate action is taken to correct identified hazards in the work place.~~

D. Supervisors' Responsibilities

- ~~1. Familiarize themselves with Agency safety policies, programs and procedures, and ensure their effective implementation and continued enforcement.~~
- ~~2. Ensure that prescribed safety training has been received by employees prior to the assignment of duties.~~
- ~~3. Ensure that all Safety, Health, and Environmental Bulletins and Notices are distributed and/or posted in a timely manner.~~
- ~~4. Ensure that safety awareness meetings are held on a regular basis (they should be conducted monthly, but not less than once per quarter). Record who was in attendance at each meeting, what was discussed, and send this documentation to the Safety and Security Office.~~
- ~~5. Ensure that all employee occupational injuries, no matter how minor, are treated immediately. Conduct investigations of employee injuries and illnesses to determine cause, and take the necessary action to prevent reoccurrence. Ensure that all required reports are completed and sent to the Human Resources Department as required.~~
- ~~6. Make daily observations of work areas and conduct periodic self-inspections to detect unsafe conditions and work practices. Utilize Agency self-inspection~~



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~~checklists as required.~~

E. Employees Responsibilities

- ~~1. Comply with all Agency safety, health, and environmental compliance rules and regulations.~~
- ~~2. Wear required personal protective equipment.~~
- ~~3. Operate only equipment in good condition, with all safety guards in place.~~
- ~~4. Report all occupational injuries, no matter how minor, immediately to a supervisor.~~
- ~~5. Encourage co-workers to work safely.~~
- ~~6. Report unsafe acts and conditions to a Supervisor or to the Safety and Security Office.~~

VI. Compliance

- A. Management is responsible for ensuring that all safety and health policies and procedures are clearly communicated and understood by all employees. Directors, managers and supervisors are expected to enforce the rules fairly and uniformly.
- B. All employees are responsible for using safe work practices, for following all directives, policies and procedures, and for assisting in maintaining a safe work environment.
- C. Our system of ensuring that all workers comply with the rules and maintain a safe work environment include:
 1. Informing workers of the provisions of our IIP Program;
 2. Evaluating the safety performance of all workers;
 3. Recognizing employees who perform safe and healthful work practices;
 4. Providing training to workers whose safety performance is deficient; and
 5. Disciplining workers for failure to comply with safe and healthful work practices.

VII. Communication

- A. We recognize that open, two-way communication between management and staff on health and safety issues is essential to an injury-free, productive workplace. The following system of communication is designed to facilitate a continuous flow of safety and health information between management and staff in a form that is readily understandable and consists of one or more of the following items:



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1. New worker orientation including a discussion of safety and health policies and procedures;
2. Review of our IIP Program;
3. Workplace safety and health training programs;
4. Regularly scheduled safety meetings;
5. Effective communication of safety and health concerns between workers and supervisors, including translation where appropriate;
6. Posted or distributed safety information;
7. A system for workers to anonymously inform management about workplace hazards; and
8. An employee/management safety and health committee under the name Safety and Security Coordinator that meets regularly, prepares written records of the safety and health committees meetings, reviews results of the periodic scheduled inspections, reviews investigations of accidents and exposures and makes suggestions to management for the prevention of future incidents, reviews investigations of alleged hazardous conditions, and submits recommendations to assist in the evaluation of employee safety suggestions.

VIII. ~~VII~~ Identification and Evaluation of Hazards.

A. ~~Inspections~~ Hazard Assessment

1. ~~Periodic inspections shall be made~~ to identify and evaluate workplace hazards shall be performed by competent observer(s) in all areas within our workplace as specified in the Safety and Security Procedures, and at the direction of the Department Director, his or her managers and supervisors. High Hazard workplaces include Safety and Security, Maintenance, Operations, and Marketing departments. Periodic inspections are performed in accordance with the Safety and Security Procedures and also to conform to the schedules as outlined by the Department Directors, his or her managers and supervisors. Assessments begin:
 - a. ~~Periodically, or at least quarterly unless noted otherwise~~ When we initially established our IIP Program;
 - b. ~~Whenever~~ new substances, processes, procedures or equipment, ~~operations, or procedures~~ which present potential new hazards are introduced into our workplace; ~~to the Agency.~~
 - c. ~~Whenever management is made aware of a new, or previously unrecognized~~ unidentified hazards are recognized; -
 - d. When occupational injuries and illnesses occur;
 - e. When we hire and/or reassign workers to processes, operations, or tasks for which a hazard evaluation has not been previously conducted; and
 - f. Whenever workplace conditions warrant an inspection.
2. Periodic inspections consist of identification and evaluation of workplace hazards utilizing applicable sections of the Hazard Assessment Checklist found as an



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attachment to Safety Procedure 802 and any other effective methods to identify and evaluate workplace hazards. ~~Each formal inspection is to be documented using the appropriate form or format to ensure that adequate and timely action is taken to correct hazards.~~

~~NOTE : Forms and format information can be obtained from the Safety and Security Office.~~

~~NOTE 1: Supervision must complete a Safety Inspection Status of Corrections Report outlining what corrective action has or will be taken for each item identified in their area of responsibility during facility safety inspections.~~

~~NOTE 2: Informal work area safety observations are to be conducted daily by supervisors and are not required to be documented unless serious hazards are found that require immediate corrective action.~~

- ~~3. Inspections should not be limited to physical hazards, but should include observations of employee performance to assure that unsafe work practices have not developed.~~
- ~~4. When making inspections or observations, unsafe conditions, which can be handled immediately, must be corrected as to prevent damage to property or injury to employees. When an imminent hazard exists which cannot be immediately abated it shall be clearly identified and isolated with barricades, locked or tagged out of service, or all exposed employees are to be removed from the area as required by the condition. Employees necessary to correct the hazardous condition shall be provided the necessary safeguards.~~

B. Accident/Exposure Investigations Job Hazard Analysis (JHA).

- ~~1. The value of a JHA is that it provides an organized approach to use in locating hazards, while clearly detailing each job task within the Agency. The JHA covers each step in a job task and provides the opportunity for feedback to clarify actions, problems and controls. Procedures for investigating workplace accidents and hazardous substance exposures include:~~
 - ~~a. Visiting the accident scene as soon as possible;~~
 - ~~b. Interviewing injured workers and witnesses;~~
 - ~~c. Examining the workplace for factors associated with the accident/exposure;~~
 - ~~d. Determining the cause of the accident/exposure;~~
 - ~~e. Taking corrective action to prevent the accident/exposure from reoccurring;~~
~~and~~
 - ~~f. Recording the findings and corrective actions taken.~~
- ~~2. Department Directors shall be responsible for insuring the development and maintenance of updated JHA's for all jobs in their department, with the assistance~~



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of the Safety and Security Office. JHA's will be documented using the appropriate format.

3. Once a job is clearly outlined and the hazards identified, it is much easier to develop the necessary controls to reduce or eliminate the hazards. The JHA has its greatest advantage in providing the Agency with a systematic operations guide that can be used in training employees or listing Do's and Don'ts for each job task.
4. Omnitrans has developed several "Codes of Safe Practices" that are included in the Agency's training programs. These "Codes of Safe Practices" include: "Rules and Regulations and Codes of Performance for Operations, Administrative, and Maintenance Personnel", and "Safety, Health, and Environmental Programs", (located in the Agency's "Facility Safety Plan", "Fleet Safety Plan", and "Environmental Compliance Plan").

C. Employee Hazard Identification and Resolution System: Correction

1. The Agency has established a system that encourages employees to openly communicate hazards to their supervisor without the fear of reprisal. This system enables the Agency to correct Unsafe or unhealthy work conditions, in a timely manner. This system is designed to identify hazardous conditions, locations, operations, procedural deficiencies, design inadequacies, or equipment failures, which could be detrimental to safe public transit system operations. practices or procedures shall be corrected in a timely manner based on the severity of the It provides for the development of recommendations for the implementation of corrective actions leading to the resolution of identified hazards. Hazards shall be corrected according to the following procedures:
 - a. When observed or discovered;
 - b. When an imminent hazard exists which cannot be immediately abated without endangering employee(s) and/or property, we will remove all exposed workers from the area except those necessary to correct the existing condition. Workers necessary to correct the hazardous condition shall be provided with the necessary protection; and
 - c. All such actions taken and dates they are completed shall be documented on the appropriate forms.
2. Procedure for reporting the hazard:
 - a. General hazards or unsafe conditions can be reported to a supervisor verbally or in writing. The Agency has designed "Employee Safety/Security Communication Forms" that can be used for this purpose. Specific unsafe conditions involving coaches or Agency vehicles shall be reported using the "Operator Daily Report". Unsafe conditions within the transit system shall be reported using the "Employee Safety Hazard Suggestion Form". Unsafe conditions involving Omnitrans facilities or grounds/yard areas shall be reported



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~~using the "Omnitrans Work Order Form". (Work order requests are processed through the Maintenance Department.)~~

- ~~b. Agency Management will attempt to correct all reported hazards which are within their control as soon as possible. For those hazards which can't be immediately rectified, estimated completion dates shall be established, affected employees notified of the hazard, and the corrective action monitored until the hazard has been corrected.~~

~~3. Resolution involving other departments and/or outside agencies.~~

- ~~a. Each department will determine both the urgency of the problem and the time needed to implement a solution. Each department shall maintain records of written complaints of reported hazards and corrective action taken.~~

~~NOTE: Those conditions that have the potential for serious injury to employees or which may require extensive time or technical assistance to correct must be reported to the Safety and Security Office. A verbal notification may be given to save time, but must be followed by a written note as soon as possible.~~

- ~~b. Those hazards reported to the Safety and Security Office for action shall be thoroughly analyzed with specific recommendations and alternative measures developed as necessary to eliminate or mitigate the hazard. This may involve modification of equipment or facilities design, rules/procedures, schedules, employee training, etc.~~
- ~~c. For those issues which require immediate action, the Safety and Security Office shall coordinate with the appropriate department(s) to expedite corrective action as required.~~
- ~~d. If the problem requires a long time and/or action from other departments and/or agencies outside the Agency, the appropriate Agency Department shall be designated to select a representative to coordinate implementation of the approved recommendations. All correspondence sent to safety, health, and environmental regulatory agencies shall be coordinated with the Safety and Security Office.~~

D. Supervisor Hazard Identification Methods:

- ~~1. Each supervisor at Omnitrans is expected to comply with the following fundamental safety concepts:
 - ~~a. Most occupational injuries and illnesses can be prevented.~~
 - ~~b. Safety is a first line responsibility.~~~~



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- ~~c. All workplace hazards can be reasonably corrected or employee safeguards provided.~~
- ~~d. First line supervision has a responsibility to train all employees to work safely.~~
- ~~e. Preventing injuries and accidents is good business.~~
- ~~f. Working safely is a condition of employment.~~
- ~~2. Supervision is responsible to ensure the safety and health of those employees within their area of responsibility.~~
- ~~3. To successfully prevent unsafe acts and unsafe conditions or hazards, all departments at Omnitrans work together as a team.~~
- ~~4. Supervision is responsible for systematically observing, correcting, and preventing recurrences of unsafe acts and hazards within the work area. This activity is a regular and routine part of their daily job. Those corrective actions that are not within the supervisor's span or control will be elevated up the management chain for appropriate action.~~
- ~~5. Hazard identification and prevention begins with the development of a safety attitude that ensures a positive commitment to safety. Supervision accomplishes this through a consistent pattern of perseverance, communication, and by setting the appropriate example for their people. Safety must remain high on the supervisor's list of priorities every day - equal to quality, morale, cost and service.~~
- ~~6. Each time a supervisor observes an unsafe act or condition they must not only stop and correct the hazard, but take the time to talk with the people involved, making sure that everyone understands and accepts the safe practices needed for each task being performed. The idea is to help each person to learn that the established safety rules and regulations are designed as a benefit to help them work safely, rather than simply being there as a device to get them in trouble.~~
- ~~7. The skills necessary to become a good observer begin with the development of two questions:
 - ~~a. What if? (What injuries can occur if the unexpected happens?)~~
 - ~~b. How? (How can this job be done more safely?)~~~~
- ~~8. The "SUPERVISOR OBSERVATION CYCLE" includes the following elements and actions:
 - ~~a. DECIDE: First the supervisor must decide to make a safety observation. This~~~~



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~~step is very important to the process since most people need to remind themselves to think about safety.~~

- ~~b. **STOP:** Next, the supervisor must stop near the operation so they are able to clearly see what is being done or what conditions may exist at this location. Merely glancing at the operation while passing by may not be enough time to complete a detailed observation.~~
- ~~c. **OBSERVE:** The supervisor then observes the people and equipment in a careful, systematic way, looking at everything, and focusing on any unsafe acts or conditions that may exist.~~
- ~~d. **ACT:** If an unsafe act/condition is observed, action must be taken immediately to correct the situation and prevent a recurrence. This action includes talking with each person who committed the unsafe act to explain why the unsafe act is hazardous to them or to others.~~
- ~~e. **COMMUNICATION AND REINFORCEMENT:** At the next safety meeting a general discussion regarding the observation of the subject unsafe act/condition should be held with all department employees to ensure that everyone is aware of the correct procedures for the operation to prevent recurrence. The objective is to prevent accidents and injuries, not to single out individuals for punishment. Individual names should not be attached to the situations being discussed. It is important that the supervisor communicates the need to correct the observed unsafe act or hazardous condition, to prevent the unsafe behavior from continuing.~~
- ~~9. When identifying hazards and attempting to develop the necessary actions toward preventing their recurrence, supervisors are reminded to look for the following most common underlying causes of unsafe acts/conditions:
 - ~~a. Lack of knowledge or training.~~
 - ~~b. Belief that "It can't happen to me" or "It won't happen this time."~~
 - ~~c. Unavailability of correct equipment to safely perform or complete the task.~~
 - ~~d. The false belief that the unsafe practice is an acceptable standard because no one has ever corrected it in the past.~~
 - ~~e. Attempt by the employee to get attention or to be part of the group.~~
 - ~~f. Morale problem, reflecting undesirable conditions on or off the job.~~~~

IX. Safety Training and Communication Methods Instruction



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A. ~~Supervisory Safety Training~~

All workers, including directors, managers and supervisors, shall have training and instruction on general and job-specific safety and health practices.

1. ~~Training and instruction shall be provided as follows: Supervisory safety training is an ongoing element of the Injury and Illness Prevention Program. Training is essential in order for supervisors to promote safety awareness to the employees working under them. Supervisors will be held accountable and responsible for the safety program in their departments. Supervisory Safety Training sessions emphasize the key role of the supervisor in the success or failure of the Injury and Illness Prevention Program. Subjects covered in the Supervisory Safety Training Program will cover a broad range of topics in the safety, health, and environmental compliance field.~~
2. ~~Supervisory safety training will be coordinated by the Safety and Security Office or may be conducted by outside contractors or guest speakers.~~

B. ~~Employee Safety Training and Communication.~~

1. ~~Employee safety training and communication are essential to the success of the Employee Injury and Illness Prevention Program.~~
2. ~~The first exposure to safety training will be upon hire. A safety orientation process is essential for all new and rehired employees. During the orientation and training process, the employee will be informed that safety is an important function that is seriously supported by both management and the employees. If this impression is properly conveyed, it is very likely that good safety attitudes will be developed.~~
3. ~~Employee safety training and instruction shall be provided:~~
 - a. ~~When the IIP Program is first established;~~
 - b. ~~To all new employees- workers, except for construction workers who are provided training through a Cal/OSHA approved construction industry occupational safety and health training program;~~
 - c. ~~To all employees workers given new job assignments for which training has not previously been received. provided;~~
 - d. ~~Whenever new substances, operations processes, procedures or equipment are introduced to the workplace and represent a new hazard- ;~~
 - e. ~~Whenever the employer is made aware of a new or previously unrecognized hazard- ;~~
 - f. ~~To supervisors to familiarize them with the safety and health hazards to which workers under their immediate direction and control may be exposed; and~~
 - g. ~~To all workers with respect to hazards specific to each employee's job~~



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assignment.

2. Workplace safety and health practices for all industries include, but are not limited to, the following: ~~Employee safety communication is accomplished through the use of safety bulletins/notices, meetings, and news/information articles generated on a routine basis to reinforce the basic safety philosophy at the Agency.~~
 - a. Explanation of the employer's IIP Program, emergency action plan and fire prevention plan, and measures for reporting any unsafe conditions, work practices, injuries and when additional instruction is needed;
 - b. Use of appropriate clothing, including gloves, footwear, and personal protective equipment;
 - c. Information about chemical hazards to which employees could be exposed and other hazard communication program information;
 - d. Availability of toilet, hand-washing and drinking water facilities; and
 - e. Provisions for medical services and first aid including emergency procedures.
3. In addition, we provide specific instructions to all workers regarding hazards unique to their job assignment, to the extent that such information was not already covered in other training.

C. Employee Safety Orientation Procedures:

1. ~~New employees will receive a briefing and be provided instruction upon hire regarding the Injury & Illness Prevention Program, as well as general/specific safety/security work procedures relative to their job assignment. Some of this activity may occur as a supervised hands on process in the employee's department.~~
2. ~~Reasons for Employee Safety Orientation:~~
 - a. ~~Establishes the proper safety attitude of the employee prior to starting work.~~
 - b. ~~Opens communication lines for reporting unsafe conditions found on the job as required by CAL-OSHA.~~
 - c. ~~Allows for training of employees in accordance with CAL-OSHA requirements of California Code of Regulations, Title 8, General Industry Safety Orders, Section 3203.~~
 - d. ~~Establishes responsibility of the new employee to follow the Agency's Safety, Health, and Environmental Compliance Program requirements.~~

D. Employee Safety Meetings and Communication Program

1. Safety Meeting Procedures



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- a. ~~These meetings are an important part of the Injury & Illness Prevention Program for office, shop, and operations personnel, because they help to reinforce the safety philosophy, allow time for supervision to communicate important safety information to the workers, and provide a method for having effective two-way communication by allowing the employees to provide important feedback on hazards in the work area.~~
- b. ~~Supervision should conduct at least one meeting a month, but not less than one per quarter. Each meeting should be scheduled for at least 10 minutes duration (longer periods may be required to maintain effective communication regarding unique safety issues).~~
- c. ~~The discussion at each meeting should include: any unsafe acts or conditions observed by the supervisor since the last meeting that the employees should be warned about and what is planned or actually being done to correct them; the results of any formal inspections conducted in the Department; selected safety and health related information or topics of interest or benefit to the employees (Review of Safety Rules, New Safety Policies and Procedures, or a short discussion of specialized safety information topics).~~

~~NOTE: Safety and Health information or specialized safety topic material can be obtained from the Safety & Regulatory Compliance Manager.~~

- d. ~~Each meeting must be documented by recording the following information: where and when was the meeting held; who chaired the meeting; who attended the meeting; and what information was discussed at the meeting. A completed Safety Meeting Report must be sent to the Safety and Security Office following each meeting.~~

2. ~~Employee Safety Communication Methods.~~

- a. ~~Alternate employee safety communication methods are most often used by the Operations Department, because of the extremely variable work hours of this organization's employees. Since the majority of the employees working in this department are Coach Operators, employee safety communication is often accomplished through the use of Coach Operator Directives, Information Bulletins and Notices which are transmitted to each employee by several methods (bulletin board posting, briefing by Dispatcher/Field Supervisor when reporting for duty, or by distribution to each operator).~~
- b. ~~The following additional methods are used throughout the year to provide effective safety communication to Operations Department personnel:~~

~~Annual 8-hour Coach Operator Refresher Training; periodic Coach Operator Onboard Ride Checks; semi-annual Coach Operator Observation Surveys~~



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~~conducted by an independent survey contractor; and the Omnitrans
Accident/Incident Review Committee.~~

X. Occupational Injury and Illness Reporting and Investigation.

~~A. All injuries and illness shall be investigated by the employee's Supervisor and shall be reported to the Human Resources Department in accordance with the instructions in this section without delay. Accident investigations are conducted to determine the causative factors, hazardous conditions and practices which brought the accident about so that proper action can be taken to prevent recurrence. The investigation must be conducted so as to obtain full information as to the causes of the accident. This includes all the correctable conditions leading to the accident, not just the major one. This point brings out the importance of eliminating the factor of fixing blame. If part of the purpose is to fix blame, or if workers believe it is, vital information will often be withheld, or the facts distorted.~~

~~B. The investigation of serious accidents will be coordinated by the Safety and Security Office, except for vehicular accidents which are the responsibility of the Operations Department. However, this participation in no way reduces the responsibilities of first line supervision. Indeed, the number of investigators and the time spent by each should, and will, increase in direct proportion to the seriousness of the accident. All of these investigators must rely heavily on the judgment of the supervisor, who not only knows best the conditions at the time of the accident, but will usually have the most accurate knowledge of the reliability of reports from the injured employee and witnesses.~~

~~C. Responsibilities of the Department Supervisor:~~

- ~~1. After initiating care for the injured employee, take immediate action to eliminate any hazards which caused the accident or which the accident created. This may include shutting down equipment, cleaning up spilled materials, providing safety equipment to employees, changing operating procedures and any other act that will insure safety for all Omnitrans employees. Supervision is responsible for providing a safe place of work and must not delay in taking appropriate action.~~

~~Note: For extremely serious accidents a complete investigation must be conducted before clean up, repair, or return of equipment to service. (Protect the accident scene for investigators.)~~

- ~~2. For injuries or illness requiring a medical doctor's treatment, the Agency's Industrial Medical Clinic, after attending the injured employee, informs the Human Resources Director of the facts and extent of injury.~~
- ~~3. In the event of hospitalization of any Omnitrans employee, due to a job related injury or illness, the employee's Department Director, and Human Resources Director must be notified immediately, day or night. The Human Resources Director~~



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is responsible for ensuring that the CEO/General Manager is notified.

4. ~~The Department Supervisor or Director will complete the Employee's Report of Injury (Supervisor's Investigation Report), and forward it to the Human Resources Department and the Safety and Security Office within 8 hours of the accident, preferably before the end of the shift when:~~

- ~~a. An employee receives treatment (beyond first aid) by a doctor for a job-related injury or illness.~~
- ~~b. An employee is injured on the job and a strong possibility exists that injury will result in treatment by a doctor.~~
- ~~c. An accident occurs, and there is the possibility of legal action.~~
- ~~d. A "near-miss" accident or incident occurs that could have involved serious injury or does result in serious facility damage.~~
- ~~e. First aid injuries should be reported on the second page of this report.~~

~~Note: Accidents involving motor vehicles (as defined by the California Motor Vehicle Code) shall be reported on the "OmniTrans Accident/Incident Report" form in accordance with the Agency's Motor Vehicle Fleet Safety Program.~~

~~f. A report is requested by the Director of Human Resources or the Safety and Security Office.~~

5. ~~No later than 24 hours after the accident, provide the injured employee with the following: Forms can be obtained from the Human Resources Department.~~

- ~~a. **Employee's Workers' Compensation Claim - DWC 1.**~~
- ~~b. **Receipt Form for DWC 1.**~~
- ~~c. **Employee Report of Injury Form(s).**~~

~~(1) If the injury does not require treatment by a doctor, use the Employee First Aid Report Form, also Employee's Report of Injury, page 2.~~

~~(2) If the injury requires treatment by a doctor, use the **Employee's Report of Industrial Injury or Illness - Form 5020**~~

~~NOTE: Have injured employee complete, sign, and return form a, b, and e1 or e2.~~



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6. ~~All employee injuries no matter how small must be reported to supervision. For minor injuries a First Aid Report must be completed and forwarded to the Safety and Security Office within eight (8) hours of the injury preferably before the end of the shift.~~
7. ~~Return to work after an on-the-job injury, that required employee to be off work for recovery, must be approved by the Agency Industrial Medical Clinic. The supervisor is responsible for complying with any medical restrictions for the returned employee.~~

D. Human Resources Department

1. ~~Ensure that the injured employee has received and acknowledged the receipt of the following:
 - a. ~~Employee's Workers' Compensation Claim - DWC 1.~~
 - b. ~~Receipt for DWC 1.~~~~
2. ~~Ensure that the injured employee has been provided with a copy of the pamphlet, "**Workers' Compensation Insurance - Employee Rights and Responsibilities**" or "**Facts for Injured Workers.**" NOTE: Given at time of hire with follow up provided by the third party administrator after an injury.~~
3. ~~Ensure that the "Employee's Report of Injury and the Supervisor's Investigation Report" has been completed. Review for completeness and need for follow-up.~~
4. ~~The Human Resources Department will ensure that the Employers First Report of Industrial Injury or Illness (Form 5020) has been completed and processed as required.~~
5. ~~If an employee is hospitalized, a Human Resources Department representative will visit the injured employee at the hospital.~~

E. Serious Injury, Illness or Fatality

1. ~~Any case involving serious injury, illness or death must be reported within 8 hours of the incident by telephone to the nearest CAL-OSHA Compliance Office at (909) 383-4321.~~
2. ~~A serious injury or illness, for reporting purposes, includes any injury or illness which requires hospitalization in excess of 24 hours for other than observation, or which results in the loss of body part, or causes any serious degree of permanent disfigurement.~~
3. ~~The Director of Human Resources, or the Safety & Regulatory Compliance Manager, or the Supervisor shall make the telephone call to CAL-OSHA including~~



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the following information:

- a. Time and date of accident.
- b. Employer's name, address and telephone number.
- c. Name and job title of person reporting the accident.
- d. Address of site of accident or event.
- e. Name of person to contact at site of accident.
- f. Name and address of injured employee(s).
- g. Nature of injury.
- h. Location where injured employee(s) was (were) moved to.
- i. List and identity of other law enforcement agencies present at the site of the accident.
- j. Description of accident and whether the accident scene or instrumentality has been altered.

XI. Motor Vehicle Accident Reporting Procedures

- A. All Omnitrans employees are required to report whenever an employee is involved in a collision with another vehicle, a person, an animal or an object and when a passenger is involved in an accident or incident on board, entering, or exiting the vehicle, or any situation that may potentially involve Omnitrans Property damage or personal injury.
- B. All Omnitrans employees are required to report whenever an employee witnesses an unusual incident or accident which takes place in the vicinity of any Omnitrans vehicle: any situation involving passengers and/or public altercations either on or near the Omnitrans vehicle or property.
 1. All accidents and incidents must be immediately reported verbally to their supervisor or a dispatcher giving the exact location of the accident and of any resulting injury.
 2. Whenever employees are involved in an accident or incident they are required to attempt to obtain witnesses. Ask courteously for names, addresses and telephone numbers.
 3. All accidents and incidents must be reported in writing on an "Omnitrans Accident/Incident Report" form available from supervisors and dispatchers before the end of their daily shift on the day of the occurrence.
 4. Security related incidents and/or altercations with passengers or the public on or near the Omnitrans vehicle or property will be reported to Omnitrans Security and Loss Prevention staff immediately by the supervisor or dispatcher.

Additional guidance may be obtained from Supervision and/or the Operations Department Fleet Safety & Training personnel.



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XII. ~~Omnitrans Accident/Incident Review Committee~~

- ~~A. Omnitrans is a member of the National Safety Council and has established a Motor Vehicle Fleet Safety Program in accordance with the guidelines published by that organization. The professional driving record of each employee is maintained in the files of the Human Resources Department. The Omnitrans Accident/Incident Review Committee meets on a regular basis to review and evaluate accidents/incidents/involving the Agency's fleet vehicles to determine preventability. These determinations are made available to the affected employee and are used to determine safe driving award eligibility or disciplinary action as appropriate.~~

XIII. ~~Disciplinary Policy and Procedure~~

- ~~A. Omnitrans has developed a disciplinary policy to prevent unsafe acts and in response to CAL-OSHA requirements in accordance with the California Code of Regulations, Title 8, General Industry Safety Orders, Section 3203.~~
- ~~B. Omnitrans will make every reasonable effort to insure the safety and health of all employees in every situation. No employee will be required or knowingly permitted to work in an unsafe or unhealthful place, except for the purpose of making it safe and healthful and then only after proper precautions have been taken to protect the employee while doing such work.~~
- ~~C. Disciplinary measures shall be conducted in accordance with the established policy as outlined in the "Omnitrans Personnel Policy Manual", "Omnitrans Rules and Regulations and Codes of Performance", and applicable "Union/Association Memorandum(s) of Understanding" (latest editions).~~

XIV. Documentation and Record keeping

- A. To assure that the Agency's Injury and Illness Prevention Program is being conscientiously administered in order to satisfy CAL-OSHA requirements, the following records are required to be maintained:
1. Records of the periodic inspections to identify unsafe conditions and unsafe work practices including:
 - a. Person(s) conducting the inspection.
 - b. The unsafe condition/practice identified.
 - c. Corrective action taken to prevent recurrence.
 2. Documentation of Safety, Health, and Environmental Compliance Training including:



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- a. Employee name or other identifier.
- b. Training date(s).
- c. Subject of training.
- d. Name of provider of the training.

NOTE: When specialized safety and health training is conducted, a Training Attendance Record should be completed to ensure all employees in attendance are given credit for the training.

NOTE: All training records are to be kept on file for a minimum of 3 years.

3. Documentation on a work related injury must be documented in the Injury and Illness Log OSHA 300, Supplementary Record OSHA 301 or in the Workers' Compensation report files as is appropriate. Include all medical treatment and follow-up accident investigation documentation.

- B. Records of Steps to Implement and Maintain IIPP:** Omnitrans is a local governmental entity (any county, city, or district, and any public or quasi-public corporation or public agency therein, including any public entity, other than a state agency, that is a member of, or created by, a joint powers agreement) and therefore is not required to keep records concerning the steps taken to implement and maintain our IIP Program.



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I. PURPOSE

To state Omnitrans' policy on Work Place and Transit System Security.

II. SCOPE

All Departments

III. PROCEDURE

- A. This formal Workplace and Transit System Security Program has been created in order to standardize all the various security and public safety policies and procedures into one effective, uniform program in compliance with the California Code of Regulations, Title 8 General Industry Safety Orders, Section 3203, Injury & Illness Prevention Program (IIPP), Federal Department of Homeland Security, Federal Transportation Security Administration (TSA) guidelines, policies and regulations. Crime and terrorism can have a substantial detrimental impact on public safety, transit system assets, personnel, and the operation of the transit system.

This Injury and Illness Prevention Program for Omnitrans is based on Cal OSHA model for a workplace with violence and security needs. Omnitrans has incorporated Cal OSHA's model IIP Program for Workplace Security which addresses the hazards known to be associated with the three major types of workplace violence. Omnitrans has incorporated specifically the Type II violent act or threat of violence by a recipient of a service provided by Omnitrans, such as a client, customer, and passenger sections.

- B. This IIPP workplace security program addresses the hazards known to be associated with the three types of work-place violence. However, it is important to keep in mind that a particular occupation or workplace may be subject to more than one type.

1. Type I workplace violence involves a violent act by an assailant with no legitimate relationship to the work-place who enters the workplace to commit a robbery or other criminal act.

In California, the majority of fatal workplace assaults involve a person entering a small late-night retail establishment, e.g., liquor store, gas station or a convenience food store, to commit a robbery. During the commission of the robbery, a worker, or more likely, the proprietor, is killed or injured.

Workers or proprietors who have face-to-face contact and exchange money with the public, who work late at night and into the early morning hours, and who often work alone or in very small numbers are at greatest risk of a Type I event. While the assailant may pretend to be a customer as a pretext to enter



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the establishment, he or she has no legitimate relationship to the workplace.

Retail robberies resulting in workplace assaults usually occur between late night and early morning hours and are most often armed robberies. In addition to workers who are classified as cashiers, many victims of late night retail violence are supervisors or proprietors who are attacked while locking up their establishment for the night or janitors who are assaulted while cleaning the establishment after it is closed.

Other occupations/workplaces may be at risk of a Type I event. For instance, assaults on taxicab drivers also involve a pattern similar to retail robberies. The attack is likely to involve an assailant pretending to be a bona fide passenger during the late night or early morning hours who enters the taxicab to rob the driver of his or her fare receipts. Type I events also involve assaults on security officers. It is known that security officers are at risk of assault when protecting valuable property that is the object of an armed robbery.

2. Type II involves a violent act or threat of violence by a recipient of a service provided by the Agency, such as a client, customer, or passenger. A Type II workplace violence event involves an assault or threat by someone who is either the recipient or the object of a service provided by the affected workplace or the victim. Type II events involve fatal or nonfatal injuries to individuals who provide services to the public. These events chiefly involve assaults on public safety and correctional personnel, municipal bus or railway drivers, health care and social service providers, teachers, sales personnel, and other public or private service sector workers who provide professional, public safety, administrative or business services to the public.

Law enforcement personnel are at risk of assault from the "object" of public safety services (suspicious persons, detainees, or arrestees) when making arrests, conducting drug raids, responding to calls involving robberies or domestic disputes, serving warrants and eviction notices and investigating suspicious vehicles. Similarly, correctional personnel are at risk of assault while guarding and transporting jail or prison inmates.

Of increasing concern, though, are Type II events involving assaults to the following types of service providers:

- (1) Medical care providers in acute care hospitals, long-term care facilities, outpatient clinics and home health agencies;
- (2) Mental health and psychiatric care providers in inpatient facilities, outpatient clinics, residential sites and home health agencies;



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(3) Alcohol and drug treatment providers;

(4) Social welfare providers in unemployment offices, welfare eligibility offices, homeless shelters, probation offices and child welfare agencies;

(5) Teaching, administrative and support staff in schools where students have a history of violent behavior; and

(6) Other types of service providers, e.g., justice system personnel, customer service representatives and delivery personnel.

Unlike Type I events which often represent irregular occurrences in the life of any particular at-risk establishment, Type II events occur on a daily basis in many service establishments, and therefore represent a more pervasive risk for many service providers.

OmniTrans is a municipal bus service provider captured in the Type II category provided by Cal OSHA.

3. A Type III workplace violence event consists of an assault by an individual who has some employment-related involvement with the workplace. A Type III event usually involves a threat of violence, or a physical act of violence resulting in a fatal or nonfatal injury, by a current or former worker, supervisor or manager; a current or former spouse or lover; a relative or friend; or some other person who has a dispute involving a worker of the workplace.

~~Type III involves a violent act or threat of violence by a current or former employee, supervisor or manager, or another person who has some employment-related involvement with the Agency, such as an employee's spouse or lover, and employee's relative or friend, or another person who has a dispute with one of our employees.~~

Available data indicates that a Type III event is not associated with a specific type of workplace or occupation. Any workplace can be at risk of a Type III event. However, Type III events account for a much smaller proportion of fatal workplace injuries than Types I and II. Nevertheless, Type III fatalities often attract significant media attention and are perceived as much more common than they actually are.

- C. This program is a core element of the Agency focused on minimizing the risk associated with intentional acts against employees, passengers, and equipment/facilities. It is designed to reduce direct and indirect costs of damage and crimes against the transit system, while improving system performance, service, and efficiency.



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IV. PROGRAM AUTHORITY

- A. The Omnitrans Loss Prevention & Security Supervisor under the direction of the Safety & Regulatory Compliance Director Manager has the responsibility for the implementation and administration of the Workplace and Transit System Security Program.
- B. ~~The Safety & Regulatory Compliance Manager, under the direction of the CEO/General Manager or designee, has the authority and responsibility for implementing the provisions of this program for Omnitrans.~~
- C. The CEO/General Manager, under the direction of the Board of Directors, has the responsibility and authority to make substantive changes in the program.
- D. All directors, managers, and supervisors are responsible for implementing and maintaining this Security Program in their work areas and for answering employee questions about the Security Program. A copy of this IIP Workplace Security Program is available to each employee.

V. RESPONSIBILITIES RESPONSIBILITY & COMPLIANCE

A. RESPONSIBILITY

The Injury and Illness Prevention Program (IIP Program) administrator, CEO/General Manager and his or her designated employee(s) have the authority and responsibility for implementing the provisions of this program for Omnitrans.

All directors, managers and supervisors are responsible for implementing and maintaining the IIP Program in their work areas and for answering worker questions about the IIP Program.

B. COMPLIANCE

- A. Omnitrans has established the following policy to ensure compliance with Agency rules on workplace security.
 - 1. Omnitrans' Management is committed to responsible for ensuring that all safety, & security and health, and workplace & transit system security policies and procedures are clearly communicated, understood, and complied with by all employees. Directors, managers and supervisors are expected to enforce the rules fairly and uniformly.
 - 2. All employees are responsible for using safe work practices, for following all directives, policies and procedures, and for assisting in maintaining a safe and secure work environment.
 - 3. Our Omnitrans system of ensuring that all employees, including



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~~supervisors, managers, and directors comply with work practices that are designed to make the workplace more secure, and do not engage in threats or physical actions which create a security hazard for others in the workplace,~~ the rules and maintain a safe work environment include:

- a. Informing employees, ~~supervisors, managers, and directors~~ of the provisions of the IIP Program for Workplace Security. ;
- b. Evaluating the performance of all employees in complying with the Agency's workplace security measures. ;
- c. Recognizing individual employees whose work practices demonstrate safe first approach, while having a security mindset and encourage fellow employees to generate a healthful workplace; ~~perform work practices which promote security in the workplace.~~
- d. Providing training and/or counseling to employees whose ~~safety or security performance is deficient;~~ in complying with work practices designed to ensure workplace security.
- e. Disciplining employees for failures to comply with ~~workplace security safe, secure and healthful work practices.~~ ; and
- f. The following practices ~~assist with maintaining compliance ensure employee compliance with workplace security directives, policies and procedures:~~
 - (1) Security awareness training included in the new employee orientation program.
 - (2) Periodic security awareness refresher training for Agency employees.
 - (3) Periodic posting of bulletins and notices of criminal activities that might affect transit operations, when received from local, state, and federal law enforcement agencies.

VI. SECURITY AWARENESS COMMUNICATION

- A. Omnitrans recognizes that ~~to maintain a safe, healthy and secure workplace we must have open, two-way communication between all employees, including directors, managers, and supervisors, on all management and staff on workplace safety, health and security issues is essential to an injury-free, productive workplace.~~ Omnitrans has a The following system of communication system is designed to ~~encourage~~ facilitate a continuous flow of safety, health and security information between management and staff ~~our employees without fear of reprisal and in a form that is readily understandable.~~ The Agency's communication system and consists of the following items:



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1. New employee orientation including a discussion of safety, security and health policies and procedures; ~~on the Agency's workplace & transit system security policies, procedures and work practices.~~
2. Periodic review of the Security IIP Program; ~~with all personnel.~~
3. ~~Workplace safety, security, and health Ttraining programs; designed to address specific aspects of security unique to Public Mass Transit, Public Safety, and Customer Relations Activities.~~
4. Regularly scheduled department safety and security meetings that include workplace security discussions;.
5. Effective communication of safety, security and health concerns between employees and Directors, Managers and Supervisors, including translation where appropriate;
6. ~~5.~~ Posted or distributed workplace safety and security information. ;
7. A system for employees to anonymously inform management about workplace security hazards; ~~or threats of violence.~~
8. An employee/management safety and health committee under the name of Safety and Security Coordinator that meets regularly, prepares written records of the safety and health committees meetings, reviews results of the periodic scheduled inspections, reviews investigations of accidents and exposures and makes suggestions to management for the prevention of future incidents, reviews investigations of alleged hazardous conditions, and submits recommendations to assist in the evaluation of employee safety suggestions;
- ~~7.~~ 9. Procedures for protecting employees who report threats from retaliation for making the report.
8. 10. Addressing security issues at Agency management staff meetings.
9. 11. Liaison with local law enforcement agencies to share local criminal activity intelligence information that pertains to or might affect transit operations in the region.

VII. ~~WORK PLACE VIOLENCE PREVENTION DEFINITIONS~~

- A. ~~Workplace Violence – The circumstances associated with workplace violence in California can be divided into three major types (These are California Specific Type Codes developed by Cal/OSHA). However, it is important to keep in mind that a particular occupation or workplace may be subject to more than one type.~~



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1. ~~Type I - In California, the majority of fatal workplace assaults involve a person entering a small late-night retail establishment. During the commission of the robbery, an employee, or more likely, the supervisor, is killed or injured.~~
 - a. ~~Employees who have face-to-face contact and exchange money with the public, who work late at night and into the early morning hours, and who often work alone or in very small numbers are at greatest risk of a Type I event. While the assailant may pretend to be a customer as a pretext to enter the establishment, he or she has no legitimate relationship to the workplace.~~
 - b. ~~Robberies resulting in workplace assaults usually occur between late night and early morning hours and are most often armed robberies. In addition to employees who are classified as cashiers, many victims of late night retail violence are supervisors who are attacked while locking up their establishment for the night or janitors who are assaulted while cleaning the establishment after it is closed.~~
 - c. ~~Other occupations/workplaces may be at risk of a Type I event. For instance, assaults on Taxicab drivers also involve a pattern similar to retail robberies. The attack is likely to involve an assailant pretending to be a passenger during the late night or early morning hours who enters the taxicab to rob the driver of his or her fare receipts. Type I events also involve assaults on security guards. It has been known for some time that security guards are at risk of assault when protecting valuable property that is the object of an armed robbery.~~
2. ~~Type II - A Type II workplace violence event involves an assault or threat by someone who is either the recipient or the object of a service provided by the affected workplace or the victim.~~
 - a. ~~Type II events involve fatal or nonfatal injuries to individuals who provide services to the public. These events chiefly involve assaults on public safety and correctional personnel, municipal bus or railway drivers, health care and social service providers, teachers, sales personnel, and other public or private service sector employees who provide professional, public safety, administrative or business services to the public.~~
 - b. ~~Of increasing concern, though, are Type II events involving assaults to service providers, e.g., customer service representatives and delivery personnel.~~
 - c. ~~Unlike Type I events which often represent irregular occurrences in the life of any particular at-risk establishment, Type II events occur on~~



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~~a daily basis in many service establishments, and therefore represent a more pervasive risk for many service providers.~~

- ~~3. Type III – A Type III workplace violence event consists of an assault by an individual who has some employment-related involvement with the workplace. A Type III event usually involves a threat of violence, or a physical act of violence resulting in a fatal or nonfatal injury, by a current or former employee, member of management; a current or former spouse or lover; a relative or friend; or some other person who has a dispute involving an employee of the workplace.~~

- ~~a. Available data indicates that a Type III event is not associated with a specific type of workplace or occupation. Any workplace can be at risk of a Type III event. However, Type III events account for a much smaller proportion of fatal workplace injuries than Types I and II. Nevertheless, Type III fatalities often attract significant media attention and are perceived as much more common than they actually are.~~

VIII. HAZARD ASSESSMENT

- ~~A. Omnitrans will be performing workplace hazard assessments for workplace security in the form of periodic inspections. Periodic inspections to identify and evaluate workplace security hazards and threats of work place violence are performed by the Department Director, Manager, Supervisor, or the Loss Prevention & Security Supervisor. shall be performed by competent observer(s) in all areas within our workplace as specified in the Safety & Security Procedures, and at the direction of Department Directors, Managers, or Supervisors.~~

- B. Periodic inspections are performed according to the following schedule:

- ~~1. Quarterly Safety and Security inspections: Safety & Regulatory Compliance Specialist and Loss Prevention & Security Supervisor; as part of the Quarterly Facility Safety Inspection Program.~~
2. When the Workplace & Transit System Security Program was initially established;
3. When new, previously unidentified security hazards are recognized;
4. When ~~crime-related~~ occupational injuries or threats of injury occur; and
5. Whenever workplace & Transit System Security conditions warrant an inspection.

- C. Periodic inspections consist of identification and evaluation of workplace hazards utilizing applicable sections of Attachment (A)-Hazard Assessment Checklist and any other effective methods to identify and evaluate workplace hazards or



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~~violence.~~ for Type I workplace security hazards include assessing:

- ~~1. The exterior and interior of the workplace for its attractiveness to robbers.~~
- ~~2. The need for security surveillance measures, such as mirrors or cameras.~~
- ~~3. Posting of signs notifying the public that limited cash is kept on the premises.~~
- ~~4. Procedures for employee response during a robbery or other criminal or threatening act.~~
- ~~5. Procedures for reporting suspicious persons or activities.~~
- ~~6. Posting of emergency telephone numbers for law enforcement, fire and medical services where employees have access to a telephone with an outside line.~~
- ~~7. Limiting the amount of cash on hand and using time access safes for large bills.~~

~~D. Inspections for Type II workplace security hazards include assessing:~~

- ~~1. Access to, and freedom of movement within, the workplace.~~
- ~~2. Adequacy of workplace security systems, such as door locks, security windows, physical barriers and restraint systems.~~
- ~~3. Frequency and severity of threatening or hostile situations that may lead to violent acts by persons who are service recipients of our Agency.~~
- ~~4. Employees' skill in safely handling threatening or hostile service recipients.~~
- ~~5. Effectiveness of systems and procedures to warn others of a security danger or to summon assistance, e.g., alarms or panic buttons.~~
- ~~6. The use of work practices such as "buddy" systems for specific emergency events.~~
- ~~7. The availability of employee escape routes.~~
- ~~8. Effectiveness of mutual aid and emergency response by local law enforcement agencies to criminal activity and threatening acts against the Agency and Agency personnel.~~

~~E. Inspections for Type III workplace security hazards include assessing:~~



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- ~~1. How well the Agency's anti-violence policy has been communicated to employees, supervisors, managers, or directors.~~
- ~~2. How well the Agency's management and employees communicate with each other.~~
- ~~3. The Agency's employee's, supervisors', managers', and director's knowledge of the warning signs/ symptoms of potential workplace violence.~~
- ~~4. Access to, and freedom of movement within, the work place by non-employees, recently discharged employees, or persons with whom one of the Agency's employees is having a dispute.~~
- ~~5. Frequency and severity of employee reports of threats of physical or verbal abuse by directors, managers, supervisors, or other employees.~~
- ~~6. Any prior violent acts, threats of physical violence, verbal abuse, property damage or other signs of strain or pressure in the workplace.~~
- ~~7. Employee disciplinary and discharge procedures.~~

~~IX.~~ VIII. ACCIDENT/EXPOSURE/WORKPLACE VIOLENCE INVESTIGATIONS

- A. Omnitrans has established the following policy for investigating incidents of workplace & transit system violence. Investigations are the responsibility of the Agency's Safety & Security Department section.
- B. The procedures for investigating workplace accidents, incidents of workplace violence, which includes threats and physical injury, and hazardous substance exposures include:
 1. Reviewing all relative previous incidents;
 2. Visiting the scene of an incident as soon as possible;
 3. Interviewing threatened or injured employees and witnesses;
 4. Examining the workplace for security risk factors associated with the incident, accident/exposure, and/or security risk, including any previous reports of inappropriate behavior by the perpetrator;
 5. Determining the cause of the accident/exposure or incident;
 6. Taking corrective action to prevent the accident/exposure or incident from recurring; and
 7. Recording the findings and corrective actions taken to the Agency's incident report file.

IX. HAZARD CORRECTION



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~~A. Hazards which threaten the security of employees shall be corrected in a timely manner based on severity when they are first observed or discovered.~~

Unsafe, unsecured or unhealthy work conditions, practices or procedures shall be corrected in a timely manner based on the severity of the hazards. Hazards shall be corrected according to the following procedures:

1. When observed or discovered;
2. When an imminent hazard exists which cannot be immediately abated without endangering employee(s) and/or property, we will remove all exposed workers from the area except those necessary to correct the existing condition. Workers necessary to correct the hazardous condition shall be provided with the necessary protection;
3. All such actions taken and dates they are completed shall be documented on the appropriate forms. (Routine spill clear ups and routine trip hazards found in the maintenance shop will not require documentation unless it is decided by management that documentation is to be made of the incident);
4. Utilizing surveillance measures, such as cameras or mirrors, to provide information as to what is going on outside and inside the workplace;
5. Procedures for the reporting of suspicious persons or activities;
6. Posting of emergency telephone numbers for on-site security, law enforcement, fire and medical services where workers have access to a telephone with an outside line;
7. Workers, supervisors, and management training on emergency action procedures;
8. Controlling access to the workplace and freedom of movement within it, consistent with business necessity;
9. Providing worker training in recognizing and handling threatening or hostile situations that may lead to violent acts by persons who are service recipients of Omnitrans;
10. Placing effective systems to warn others of a security danger or to summon assistance, e.g., alarms or panic buttons; and
11. Ensuring adequate worker escape routes when available.

~~B. Corrective measures for Type I workplace security hazards can include:~~

- ~~1. Making the workplace unattractive to robbers.~~
- ~~2. Utilizing surveillance measures, such as cameras or mirrors, to provide information as to what is going on outside and inside the workplace.~~
- ~~3. Procedures for reporting suspicious persons or activities.~~
- ~~4. Posting of signs notifying the public that limited cash is kept on the premises.~~



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~~5. Posting of emergency telephone numbers for law enforcement, fire and medical services where employees have access to a telephone with an outside line.~~

~~6. Limiting the amount of cash on hand and using time access safes for large bills.~~

~~7. Employee, supervisor and management training on emergency action procedures.~~

~~C. Corrective measures for Type II workplace security hazards can include:~~

~~1. Controlling access to the workplace and freedom of movement within it, consistent with business necessity.~~

~~2. Ensuring the adequacy of workplace security systems, such as door locks, security windows, physical barriers and restraint systems.~~

~~3. Providing worker training in recognizing and handling threatening or hostile situations that may lead to violent acts by persons who are service recipients or customers.~~

~~4. Placing effective systems to warn others of a security danger or to summon assistance, e.g., alarms or panic buttons.~~

~~5. Providing procedures for a "buddy" system for specified emergency events.~~

~~6. Ensuring adequate worker escape routes.~~

~~D. Corrective measures for Type III workplace security hazards can include:~~

~~1. Effectively communicating our establishment's anti-violence policy to all employees, supervisors, managers, or directors.~~

~~2. Improving how well our establishment's management and employees communicate with each other.~~

~~3. Increasing awareness by employees, supervisors, managers, and directors of the warning signs of potential workplace violence.~~

~~4. Controlling access to, and freedom of movement within, the workplace by non-employees, including recently discharged employees or persons with whom one of the Agency's employees is having a dispute.~~

~~5. Providing counseling to employees, supervisors, managers, or directors~~



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~~who exhibit behavior that represents strain or pressure which may lead to physical or verbal abuse of co-employees.~~

- ~~6. Ensure that all reports of violent acts, threats of physical violence, verbal abuse, property damage or other signs of strain or pressure in the workplace are handled effectively by management and that the person making the report is not subject to retaliation for reporting the incident.~~
- ~~7. Ensure that employee disciplinary and discharge procedures address the potential for workplace violence.~~

XI. TRAINING AND INSTRUCTION

A. ~~Omnitrans has established the following policy on~~ for training all employees with respect to workplace & transit system security. :

B. All employees, including directors, managers, and supervisors, shall have training and instruction on general and job-specific ~~workplace safety, security and health practices. Training and instruction shall be provided as follows: when the Workplace & Transit System Security Program is first established and periodically thereafter. Training shall also be provided to all new employees and to other employees for whom training has not previously been provided and to all employees, supervisors, managers, and directors given new job assignments for which specific workplace security training for that job assignment has not previously been provided. Additional training and instruction will be provided to all personnel whenever the employer is made aware of new or previously unrecognized security hazards.~~

- 1. When the IIP Program is first established;
- 2. To all new employees;
- 3. To all employees given new job assignments for which training has not been previously provided;
- 4. Whenever new substances, processes, procedures or equipment are introduced to the workplace and represent a new hazard;
- 5. Whenever the employer is made aware of a new or previously unrecognized hazard;
- 6. To supervisors to familiarize them with the safety and health hazards to which workers under their immediate direction and control may be exposed; and
- 7. To all employees with respect to hazards specific to each employee's job assignment.

B. ~~General workplace & transit system security~~ Training and instruction specific to security and workplace violence shall be provided as follows includes, but is not limited to, the following:

- 1. Explanation of the IIP Program for Workplace Security ~~Workplace & Transit System Security Program~~ including measures for reporting any violent acts or threats of violence. ;



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2. Recognition of workplace security hazards including the risk factors associated with the three types of workplace violence. ;
 3. Measures to prevent workplace violence, including procedures for reporting workplace security hazards or threats to directors, managers, and supervisors. ;
 4. Ways to defuse hostile or threatening situations. ;
 5. Measures to summon others for assistance. ;
 6. Employee routes of escape. ;
 7. Notification of law enforcement authorities when a criminal act may have occurred. ;
 8. Emergency medical care provided in the event of any violent act upon an employee; and
 9. Post-event trauma counseling for those employees desiring such assistance.
- C. In addition, Omnitrans provides specific instructions to all employees regarding workplace security hazards unique to their job assignment, to the extent that such information was not already covered in other training. Additional training and instruction will be provided to all personnel whenever the employer is made aware of new or previously unrecognized security hazards.
- ~~D. Omnitrans has chosen the following Type I training and instruction for directors, managers, supervisors, and employees:~~
- ~~1. Crime awareness.~~
 - ~~2. Location and operation of alarm systems.~~
 - ~~3. Communication procedures.~~
 - ~~4. Proper work practices for specific workplace activities, occupations or assignments, such as late night coach operations, and field supervisors.~~
- ~~E.~~ D. Omnitrans has chosen the following items for Type II training and instruction for directors, managers, supervisors, and employees:
- ~~1. Self-protection~~
 2. 1. Dealing with angry, hostile or threatening individuals. ;



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- ~~3.~~ **2.** Location, operation, care, and maintenance of alarm systems and other protective devices;
- ~~4.~~ **3.** Communication procedures; and
- ~~5.~~ Determination of when to use the "buddy" system or other assistance from co-employees.
- ~~6.~~ **4.** Awareness of indicators that lead to violent acts by service recipients.

F. **E.** Workplace safety and health training practices for all industries include, but are not limited to, the following:

- 1.** Explanation of the employer's IIP Program, emergency action plan and fire prevention plan, and measures for reporting any unsafe conditions, work practices, and injuries;
- 2.** Use of appropriate clothing, including gloves, footwear, and personal protective equipment;
- 3.** Information about chemical hazards to which employees could be exposed and other hazard communication program information;
- 4.** Availability of toilet, hand-washing and drinking water facilities; and
- 5.** Provisions for medical services and first aid including emergency procedures.

~~OmniTrans has chosen the following Type III training and instruction for directors, managers, supervisors, and employees:~~

- ~~1. Pre-employment screening practices.~~
- ~~2. Employee Assistance Programs.~~
- ~~3. Awareness of situational indicators that lead to violent acts.~~
- ~~4. Managing with respect and consideration for employee well-being.~~
- ~~5. Review of anti-violence policy and procedures.~~

XIII. RECORDKEEPING

- A. **Inspections:** Records of Workplace & Transit System Security inspections, including the person(s) conducting the inspection, the unsafe conditions and work practices that have been identified and the action taken to correct the identified unsafe conditions and work practices, are recorded on a quarterly facility inspection report.
- B. **Training:** Documentation of security training for each employee, including the



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employee's name or other identifier, training dates, type(s) of training, and training providers.

- C. **Record Retention:** Inspection records and training documentation are maintained according to the following checked schedule:

1. For three years, except for training records of an employee who has worked for less than one year which are provided to the employee upon termination of employment.

- D. **Records of Steps to Implement and Maintain IIPP:** Omnitrans is a local governmental entity (any county, city, or district, and any public or quasi-public corporation or public agency therein, including any public entity, other than a state agency, that is a member of, or created by, a joint powers agreement) and therefore is not required to keep records concerning the steps taken to implement and maintain our IIP Program.

XIV. TRANSIT BUS SYSTEM SECURITY ORGANIZATIONAL ELEMENTS

A. Facility Security Program

1. ~~Physical security at all Agency facilities is provided by the Agency's Safety & Security section. This security force is comprised of civilian security officers, non-sworn and compensated Agency staff personnel.~~
2. ~~Electronic surveillance cameras and door/gate access control systems are provided for external perimeter and critical area monitoring.~~
 - a. ~~Electronic security systems are operated by the Safety & Security Office and/or contracted security service.~~
 - b. ~~The repair and servicing is shared by the Safety & Security Office, and the Information Technology organization due to the interface of the systems with the Agency's LAN/WAN system.~~
3. ~~All employees and visitors are required to wear Agency issued identification badges at all times while at facilities.~~

B. Transit Bus System Security Program

1. ~~A cooperative program between the Agency and local law enforcement provides for rapid response to incidents onboard Transit System Buses. This response force is comprised of sworn and commissioned law enforcement officers.~~
2. ~~Surveillance cameras and silent alarm systems have been installed on~~



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each transit bus.

~~G. Bus System Safety & Security Plan~~

- ~~1. The Agency's Bus System Security Plan has been formulated from the Federal Transit Administration (FTA) Memorandum of Agreement with the Transportation Security Administration (TSA) guidelines issued from the Department of Homeland Security.~~
- ~~2. Additional, guidelines and guidance have been obtained from the American Public Transportation Association, Bus System Safety Committee.~~
- ~~3. The Safety & Regulatory Compliance Manager acts as the Agency's functional Chief of Public Safety under the Plan, with the primary responsibility for the management of the Agency's Bus System Safety & Security Plan and Security Audit & Inspection activities under FTA/TSA guidelines.~~
- ~~4. The Loss Prevention & Security Supervisor acts as the Agency's functional Deputy Chief of Public Safety under the Plan and has the primary responsibility for the law enforcement liaison function and coordination of emergency management operations under the California Standardized Emergency Management System..~~
- ~~5. The basic philosophy of the Bus System Security Plan is to provide a system that cultivates a culture that minimizes or prevents incidents of criminal behavior, reduces fear, and improves the quality of life for employees and customers of the transit system. It is also responsible for providing the means to affect or respond to adverse behavior and to produce positive results.~~

~~D. Crime Prevention through Environmental Design (CPTED)~~

- ~~1. In accordance with the guidelines from the FTA and TSA, all new construction projects and existing facilities will undergo a review by the Agency's Safety & Security Staff to ensure that the principals of CPTED have been implemented in the project. Existing facilities will undergo a CPTED review and upgrades and modifications implemented in a timely fashion to ensure regulatory compliance. The CPTED review must be documented and kept on file with the project's contract documentation.~~

~~E. System Security & Emergency Preparedness Committee~~

- ~~1. Shall provide a forum for the discussion and review of security programs, plans, and activities. The committee will provide key senior and middle management personnel the opportunity to meet, share, and obtain~~



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~~concurrence for various security ideas, concepts, and issues.~~

- ~~2. The committee will also act as the Agency's Critical Response Crisis Management Team. This team will convene for work place violence or other emergency situations requiring advice on security aspects of contemplated actions and/or inactions. When this team is convened additional individuals such as the Employee Relations Manager, legal counsel, and the Agency's Public Information Officer may be called to the meeting.~~

F. Information Security Steering Committee

- ~~1. This committee will be formed and chaired by the Director of Information Technology on an ad hoc basis, and will be responsible for oversight of cyber security, and electronic information systems security programs at the Agency.~~

G. Security Reporting Requirements

- ~~1. A monthly report of transit related accidents, incidents, and adverse activity against the transit system is to be filed through the automated National Transit Data Base (NTD), Form 405.~~
- ~~2. Transit systems incident reports and physical evidence are provided to local law enforcement.~~
- ~~3. Additional reporting may be required to the National Incident Based Reporting System (NIBRS), and Federal Bureau of Investigation Uniform Crime Report (UCR) when requested by FTA/TSA.~~