

PACIFIC MARITIME ASSOCIATION - Inter/intra Office Memo

*From  
Northern California*

September 21, 1976

TO: Area Supervisors  
Area Managers

FROM: T. N. Lane

SUBJECT: ACCIDENT PREVENTION POLICY BOOKLET

Enclosed is the completed version of the policy booklet. It is recommended that each member of the Department be familiar with the policy as it applies to their duties.

TNL/srb  
Attachment  
cc: R. R. Holtgrave

RECEIVED  
JUN 06 1984  
PACIFIC MARITIME ASSOC'N.  
TAPD - SCA  
WILMINGTON, CALIF.

PACIFIC COAST ACCIDENT PREVENTION DEPARTMENT POLICY

June, 1976

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## PACIFIC COAST ACCIDENT PREVENTION DEPARTMENT POLICY

Listed on the attached pages, not necessarily in order of their importance, are the various factors which make up the Pacific Maritime Association Accident Prevention Department Policy.

These statements supercede all previous statements on the topics covered.

## CAMERAS AND THE TAKING OF PICTURES

When investigating an accident which has involved serious injury or fatalities, and in which ship's gear and equipment has played such a part that there is possibility of third party suits, no pictures should be taken of the gear or equipment in question unless the steamship company requests it, and then the pictures and negatives should be turned over to the company.

Photos for use in training purposes or safety talk presentations by staff may be taken when permission of the Member Companies involved in the operation has been obtained.

### COMPANY SAFETY MEETINGS

Some Member Companies have established regular "safety meetings". All Companies should be encouraged to hold such sessions. The Area Supervisor or his assistant should attempt to actively participate in these meetings and to make films or materials available to the Member Companies for such meetings.

## CONFIDENTIAL INFORMATION

Most of the information which the Training/Accident Prevention Department receives from Member Companies relative to accidents, manhours or other statistics is confidential information. To preserve this -- and still allow a free flow of information among Member Companies -- the following procedure shall be adhered to:

1. Upon receipt of a written request by a Member Company, the individual injury record (if any) requested will be released if it can be ascertained that the requesting Company has an insurable interest in the case.
2. The information to be released shall consist of the name and registration number of the individual; the date of each injury he reported to any member of the PMA; the name of the Member reporting the injury; whether the injury was aboard ship or on the dock; whether the injury resulted in lost time or no lost time; and the part of the body injured.

This procedure will allow the Member Companies receiving information to contact other Members for detailed information or to review their own files for pertinent data.

## CONSENSUS RESPONSE TO ADMINISTRATIVE PROPOSALS

Coast shall distribute all available information re state or federal agency legislation effecting Member Company accident prevention efforts to Area Supervisors. When it is determined that a PMA response is in the best interest of the Members, the following procedures shall be followed:

1. Each Area shall hold a meeting of concerned Member Company representatives to analyze the content of the proposal and to suggest comments to be included in the response. It is important that the meeting group be authorized by the Area Accident Prevention Committee or the comments of the group be approved as representative of the comments of the Members in the Area.
2. Written comments explaining the Member's position on each item considered shall be forwarded to the Director as soon as possible. This written comment shall include the names and affiliation of all persons attending the meeting. Comments should be as specific as possible.
3. Coast will develop a consensus response based on input from all Areas and, time permitting, distribute copies to each Area office for final review prior to submission.



## HARD HAT PROGRAM

Each Area Supervisor shall be responsible for the inventory control and dispatch hall procedures for providing hard hats to employees through the payroll deduction system.

Coast will negotiate purchase agreements with suppliers and order all shipments of hats. Areas will maintain a sufficient inventory to cover all likely demands, and notify Coast when additional hats will be needed.

## INJURY HISTORY INFORMATION

Each Area office shall maintain an injury history file on individual employees. This file may be hand-posted or computerized. Information from the injury history file will be released in accordance with the confidential policy contained herein.

## JOINT ACCIDENT PREVENTION COMMITTEE

Each Area shall encourage and maintain, on a port-by-port basis, an active Joint Accident Prevention Committee in accordance with the provisions of Section 16 of the Pacific Coast Longshore Contract Document. In addition, a foreman and clerk representative may be added when deemed appropriate. Employee members of the Committee will be paid at the applicable straight time rate for four hours to cover their expenses when attending the meeting.

The actual terms of membership of the Committee, development of agenda items and scheduling of meetings shall be determined by the Area Supervisor based on past practices and success in the various ports.

## NEW EMPLOYEES' SAFETY TRAINING

Each Area Supervisor shall work with the Labor Relations Department to properly indoctrinate newly registered (Class B) longshoremen and clerks relative to their responsibilities toward accident prevention.

#### NEW MEMBER COMPANY VISIT

Each Area Supervisor shall personally visit new Member Company operations determined to be likely participants in this Department's programs and activities. The various recordkeeping and statistical services, as well as other Department functions, should be explained.

## ON-THE-JOB DISPUTES

An Accident Prevention Department representative called to the job on health and safety disputes should make his statements before the parties only when so requested by the Area Manager or one of his Labor Relations Administrators or Assistants.

When called upon to make such statements, the Accident Prevention Department representative should confine his opinion solely to the specific health or safety dispute at hand.

If, in the opinion of the Accident Prevention Department representative, there are other health and safety situations that should be discussed in regard to the safe operation on the job, these situations should be discussed privately with the PMA Labor Relations Department representative and the company supervision on the job.

## PERIODIC CONTACT WITH MEMBER COMPANIES

As accident/injury trends change or as particular problems arise within a company, the policy-making member of that company should be apprised of the conditions and advised as to how the undesirable trend, or particular problem, can be overcome.

Problems concerning the entire Area should be taken up with the Area Accident Prevention Committee. Problems likely to effect other Areas should be referred to the Coast Director, Accident Prevention Department, for evaluation with respect to solutions and/or coastwise involvement.

## PERIODIC REPORTS

Area Supervisors will develop reports on a quarterly basis, recapping the Area's activities. Copies will be sent to the Director, Accident Prevention, Area Managers and each Area Supervisor. Reports should include, but not be limited to, the following points, to the extent that such information has not been reported in regular minutes or correspondence:

1. Numbers of surveys and safety disputes.
2. Brief general evaluation of JAPC and AAPC meetings.
3. Brief general description of other industry meetings attended by staff, i.e., Governors' Conference, NSC Congress, DOT Seminar, etc.
4. Staff involvement with Member Company safety meetings, stewards' councils or stop work meetings.
5. Significant staff or personnel changes within companies or agencies with which this Department has regular contact.
6. Briefly summarize state and federal OSHA activity and citation experience.
7. Plans for special activities during the following quarter.
8. Other items of possible value to the Area office staff in other offices.



PRESS RELEASES, QUOTES FOR PUBLICATION, ETC.

1. No staff member will allow himself to be interviewed for any outside publication without first securing approval from his Area Manager and Coast Director.
2. No member of staff will express his opinions in a quotable manner without first securing approval of his Area Manager and the Coast Director prior to a public release of the information.
3. Following approved interview, the draft text shall be submitted to Coast Headquarters for revision and/or approval prior to publication.
4. All written releases for outside publication shall first be approved by Coast.

## QUARTERLY/CUMULATIVE INJURY FREQUENCY REPORTS

Quarterly reports shall be prepared for each Member Company employing employees under Agreements negotiated and administered by the Pacific Maritime Association. Reports shall be presented and discussed personally with the appropriate local management of each company as needed to keep the company informed of current problems and trends. These reports will be based upon the statistics gathered for that particular company during the quarter, with a comparative analysis as needed to emphasize problems or trends. Recommendations based on these reports should be given to the company, along with suggested educational material which may assist the company in overcoming a particular type of accident trend. This quarterly contact with each company is considered to be a vital part of the program in that it provides a major line of communication between the Department and top management.

In compliance with federal regulations, recordkeeping reports shall be prepared on behalf of Member Companies and distributed in accordance with the Recordkeeping Procedures Manual.

## SAFETY INCENTIVES

Incentive programs designed to encourage longshoremen and clerks to support and promote accident prevention ideals will be evaluated on an Area by Area basis and utilized where deemed successful. Coast shall be advised prior to implementing incentive programs.

## SAFETY SHOE PROGRAM

Continued efforts shall be made to encourage longshoremen and clerks to wear appropriate safety footwear. Provision shall be made in each port on the Coast whereby longshoremen can purchase safety shoes. Payroll deduction plans will be implemented where possible.

## SKILLS TRAINING

The Area staff shall work with the Coast Training Department in accordance with the Training Procedures Manual.

## STATISTICS

An analysis for coding of each injury report shall be made and statistics developed as needed to assist the Area Supervisor in guiding his day to day accident prevention efforts.

All injury reports must be coded and processed in accordance with the Accident Prevention Department Recordkeeping Manual.

Percentage comparisons indicating increases or decreases in various categories or trends may be used as deemed proper by the Area Supervisor. Such comparisons shall be of the respective Area's statistics only, and comparisons, Area by Area, shall not be utilized without Coast approval. Company by company comparisons shall not be provided by staff to Member Companies.

## SUPERVISORS' SEMINARS

Area Supervisors shall actively participate in the Supervisors' Seminars. The materials furnished for the superintendents' and foremen's guidance by the Training Department should be oriented to overcome current accident prevention problems or malpractices. Appropriate numbers of valid first aid cards, as well as other topics such as rules and regulations, fire prevention and safe productivity should be included.

## SURVEYS

Dock and ship surveys shall be pursued to provide maximum coverage of Member Company operations.

Any violations of safety rules or recognized safe work practices shall be reported to Member Company supervision for correction.

Staff recommendations for corrections of major consequence to Member Company operations shall be discussed with the highest level of supervision having responsibility for the correction. In cases where major vessel gear or certification problems are encountered, staff shall discuss those matters with the agent or vessel representative on the vessel, at the dock facility or by telephone. In cases where stevedore responsibility is involved or when the stevedore may be subject to citation due to a violative condition, a superintendent or representative shall be informed. On-the-job discussion with Member Company representatives shall be conducted in a manner which will avoid controversy or misuse of staff statements by employees or their Union.

Conditions or situations not corrected at the time of the survey and requiring additional follow-up should be pursued by the Area Supervisor or delegated assistant to the appropriate level of management within the Member Company.

Written survey reports shall be provided to Member Companies when requested or when deemed necessary by the Area Supervisor, due to exceptionally bad or good conditions, or when the written report may be helpful to vessel or facility operators in making necessary corrections.

When surveys reveal the need for corrections or modifications that may effect equipment utilized in more than one area, i.e., vessel construction, chassis lock recommendations or others of a similar nature, Coast office shall be advised and utilized to coordinate the Department's recommendation.

Member Companies shall be regularly advised of the Department's survey activity of the companies' operations.

Copies of written survey reports will be retained no longer than two years in each Area office.

Vessels surveyed, which reveal exceptionally bad conditions and are determined to be bound for another Area on the Coast, shall be reported to the Area Supervisor of the next port of call.



### UNION MEETINGS

Appropriate accident prevention materials shall be distributed and discussed before the Union at their regular stop work, stewards or membership meetings. This program will be sponsored and conducted by the Joint Accident Prevention Committee. Area Manager approval shall be obtained prior to staff appearances before stop work or membership meetings.