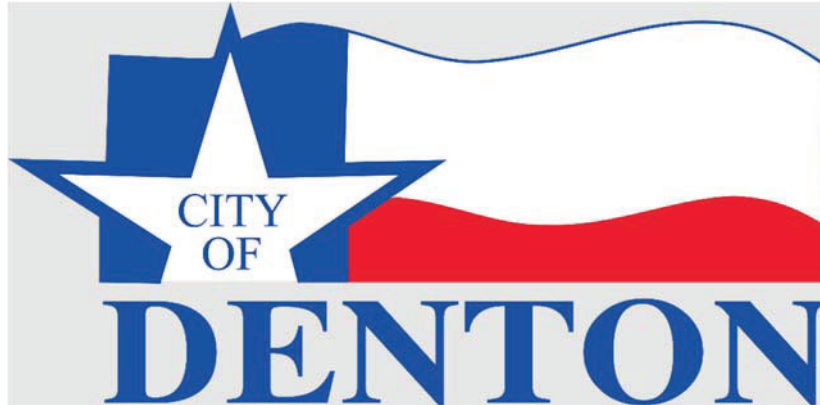




DOCUMENT: PLAN	DOCUMENT NUMBER: PR/PLN/08.01
TITLE: RISK MANAGEMENT PLAN Parks and Recreation	REVISION DATE: 2/1/2023

RISK MANAGEMENT PLAN

Parks and Recreation



February 2023

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1. PURPOSE

This purpose of the Risk Management Plan is to ensure that a systematic process is in place for identifying and managing hazards and risks to minimize adverse impacts.

2. OBJECTIVE

The objective of this Plan is to:

- To prevent injury, damage and financial loss through the identification, evaluation and control of potential risks associated with new projects and operational activities or changes to existing ones to minimize adverse impacts.
- To ensure personnel are advised on their specific risks and controls to mitigate the risks.
- To monitor ongoing effectiveness of key controls.

3. APPLICABILITY

This plan applies to City employees, permanent or temporary, and contractors who work onsite.

4. ACCOUNTABILITY

The City of Denton employs a Safety Director and Deputy Director of Risk and Compliance who report to the Director of Human Resources.

4.1 Safety Director

The Safety Director is responsible to:

- Provide oversight, coordination and monitoring of health and safety (H&S) programs and practices in all city departments by means of the Safety Oversight Team. The Safety Oversight Team is established as a governance model for H&S performance and to empower all management to respond to H&S issues and take necessary measures to resolve business issues as they relate to H&S performance.
- Coordinate and deliver related training programs that will provide and promote safe work practices and workplace safety awareness.

4.2 Deputy Director of Risk and Compliance

The Deputy Director of Risk and Compliance is responsible for the management and direction of the City's self-insured risk program, oversight of the third-party claims administration for workers' compensation, in-house liability claims program, and workers' compensation.

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4.3 Director of Parks and Recreation

The Director of Parks and Recreation is responsible to:

- Provide direction and consultation to the city in the ongoing operation and development of new initiatives, programs, and operations that affect the city's exposure to risk and loss.
- Provide resources (personnel, training, and equipment) for the proper implementation of this Plan.
- Sign off on Risk Assessment findings and mitigation plans (if any).

4.4 Assistant Directors of Parks and Recreation

Assistant Directors of Parks and Recreation are responsible to:

- Ensure that resources (personnel, training, and equipment) are made available for the proper implementation of this Procedure.
- Ensure the Hazard Register is monitored and maintained.
- Approve specific risk control measures for activities/work tasks.
- Routinely verify that recommended risk mitigation measures from risk assessments are addressed and implemented.

4.5 Managers/Supervisors/Employees

Managers/Supervisors/Employees are responsible for:

- Compliance with this Plan,
- Enforcing specific rules and policies as related to each facility, including but not limited to:
 - Personnel utilized
 - Supervision
 - Equipment used
 - Keys/security
 - Inspections
 - Emergency response procedures
 - Phone access
 - Opening/Closing procedures
 - Signage
 - Record Keeping/Retention

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5. ABBREVIATIONS

EAP	Emergency Action Plan
EPA	Environmental Protection Agency
H&S	Health and Safety
NIMS	National Incident Management System (NIMS)
NRF	National Response Framework (NRF)
OSHA	Occupational Safety and Health Administration
PARD	Parks and Recreation Department
PIC	Person-In-Charge
PPE	Personal Protective Equipment
RAM	Risk Assessment Matrix
SDS	Safety Data Sheet
TCEQ	Texas Commission on Environmental Quality
PDT	Preventative Disease Transmission
ARC	American Red Cross
BPT	Bloodborne Pathogen Training

6. PRIORITY RISKS AND PRIORITIZING RISKS

Risk Management is a systematic and living process. Successful risk management includes compliance with applicable governance requirements, assurance to stakeholders regarding the management of risk and improved decision-making that support more efficient operations, effective tactics, and efficacious strategy. Risks can impact an organization in the short, medium, and long term. The very definition of risk, “effect of uncertainty on objectives,” links risks to objectives.

As of December 2022, Parks and Recreation, Safety, and Risk Management are working together to improve and develop systematic processes and tools to identify and evaluate potential hazards related to Parks.

6.1 Hazard Risk

Hazard identification is the first step in the risk assessment process. Hazards are an intrinsic property of anything with the potential to cause harm. Harm includes ill health and injury, damage to property, plant, products or the environment, production losses, or increased liabilities.

Some hazards identified are controlled through regulatory compliance and judicial use of industry accepted Codes, Standards and Guidelines. Other hazards, hazard events and consequences associated with a particular project or work scope are specific to that activity and must be identified. Input may be required from a wide range of project stakeholders when identifying hazards, since each will have different perspective on the potential hazard events and the risk identified.

All hazards identified and evaluated during the “identify hazards” process should be recorded in a Hazard Register.

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6.2 Risk Assessment Tool

To provide a consistent and systematic estimation of risk, the Parks and Recreation Department (PARD) plans to use a risk assessment tool, such as the Risk Assessment Matrix (RAM) illustrated in Figure 1 in a qualitative manner. The use of an assessment tool is intended to provide a convenient and easy to use structure to evaluate or compare the significance of an identified hazard, event, or associated risk and then to determine a risk value and treatment strategy.

Risk is generally understood in terms of the combination of the likelihood (or probability) of occurrence of a consequence and the severity of that consequence. An assessment tool will help to weigh the factors of likelihood and severity to determine a risk value.

FIGURE 1 – EXAMPLE OF A QUALITATIVE RISK ASSESSMENT MATRIX

Consequence Matrix				Risk Matrix						
Consequence Categories				Likelihood Level						
Risk Severity	People	Property/ Damage Loss	\$\$							
				Will not occur under most circumstances <small>Never heard of in Parks & Rec</small>	Unlikely to occur depending on circumstances <small>Heard of in Parks & Rec</small>	Probably will occur in some circumstances <small>Has happened several times in Parks & Rec</small>	Likely to occur in most circumstances <small>Has happened at the City</small>	Will occur in most circumstances <small>Has happened more than once/yr at the City</small>		
				Remote	Rare	Possible	Probable	Expected		
				A	B	C	D	E		
Catastrophic	Multiple fatalities	Extensive Damage	x > \$1M	Severity Level	5	A5	B5	C5	D5	E5
Hazardous	Permanent disability or single fatality	Major damage	250k < x < \$1M		4	A4	B4	C4	D4	E4
Major	Restricted work/ transfer case or lost work day case (person cannot go to work or school for at least 1 day following the injury)	Localized damage	50k < x < \$250k		3	A3	B3	C3	D3	E3
Minor	Medical treatment case	Minor damage	5k < x < \$50k		2	A2	B2	C2	D2	E2
Negligible	First aid case	Slight to no damage	0 < x < \$5k		1	A1	B1	C1	D1	E1

Parks staff using the assessment tool will be trained and will be actively involved in the development of training guides and resources to ensure it can be applied systematically and consistently to analyze and estimate the risk for identified hazards regarding their effect.

Identified hazards will be evaluated to determine what strategies are in place to manage the risk and/or can be taken to manage the risk appropriately based upon the risk value (see Risk Treatment, Transfer, and Acceptance Strategies in Sections 6.4, 6.5, and 6.6).

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Staff expects to complete a hazard identification and assessment for Parks and Recreation by September 2023 and plans to formalize the process, including developing guides for how a hazard register will be reviewed and monitored.

6.3 Playground Risk Methodology

Playground hazards and risk are assessed using a different methodology. All city owned playgrounds are assessed using eleven (11) different factors. Once they're assessed, they're given a score based on a Risk Frequency Summary Form. Their score determines the inspection frequency. Depending on the score, the playgrounds will be inspected per the chart below:

Key to Inspection Frequency Chart		
Points	Routine Visual Inspections	Operational Inspections
71 or more	2 or more times per week	2-3 times per month
56-70	Weekly	Monthly
41-55	Biweekly	Bimonthly
40 and below	Monthly	Seasonal

6.4 Risk Treatment

Identified hazards, their likelihood, and assessed impact are subjected to a strategy of risk treatment. Risk treatment is conducted as a part of the risk management process where all the previous identification and assessment work is used to determine if there are sufficient and effective control measures in place which will ultimately result in a level of risk that is as low as reasonably practicable.

Some risk treatment strategies are summarized below in Figure 3.

FIGURE 2 – RISK TREATMENT STRATEGIES

Risk Treatment Strategies	
Strategy	Description
Risk Avoidance	A decision to not become involved in or action to withdraw from a risk situation.
Risk Optimization	A decision to minimize the negative and to maximize the positive consequences and their respective probabilities of occurrence.
Risk Transfer	A decision to share with another party the burden of loss or the benefit of gain, from a risk, and the measures to reduce the risk.
Risk Retention	A decision to accept the burden of loss, or benefit of gain, from a risk.

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6.5 Risk Transfer

In some cases, the city transfers risk using contractual shifting from the city to a third party. The need for risk transfer and the specific type required is determined through the contract review process in discussion with the Risk Management and Legal Departments.

Examples of risk transfer include:

- Agreements/Contract
- Self-Insurance
- Special Event Insurance
- Employees and Volunteers – Liability Coverage
- Employees – Workers’ Compensation Coverage
- Waivers/Releases
- Leases
- Rental Damage Deposit

In cases where the contract or agreement does not specifically require risk transfer, such as the PARD Special Instructor Agreement, staff will ask the following questions to determine if risk transfer may be necessary:

- Does the program/activity require participants to engage in exercise or heavy physical activity?
- Is the contract with a personal fitness trainer, dog trainer, or involve outdoor recreation?
- Will chemicals be used during the program or activity?
- Is the program/activity considered high risk or “outside the norm”?
- Will the program utilize tools or equipment that could potentially lead to an injury by a participant?
- Is the contract with a company versus an individual?

If the answer to any of these questions is yes, or if there is any doubt staff will seek guidance from Risk Management to determine requirements for risk transfer.

6.6 Risk Acceptance

Once a risk has been identified, assessed, and the means of mitigating it to levels that are that are as low as reasonably practicable are agreed upon, this together with any residual risk, must be accepted and agreed by management.

Hazard risk management is a continuous process. New risks are identified throughout the year and beyond, similarly some will be closed and removed from the registers in year. Assessments of likelihood and impact need to be reviewed to monitor the effect that management actions are having on the risk. Where appropriate, new management actions may need to be identified to further reduce the risk.

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7. RISK CONTROLS

Controls in place to mitigate risk are outlined below.

7.1 Safety Manual

Conduct and standards expected by all employees are contained in the City's Safety Manual. This manual outlines the City's expectations and requirements for performing work in a healthy, safe, and environmentally sound manner.

See City Policy No. 410.013 Safety Manual, 2022 Edition

7.2 Training and Certifications

7.2.1 Required Safety Training

All PARD staff are required to obtain CPR/First Aid certification within 60 days of hire. Childcare licensing for preschool camp also requires bloodborne pathogen training.

Defensive Driving training is required every two years for any staff who drive City vehicles.

Van training provided by Safety is included as part of the required defensive driving course for staff who transport citizens in City owned 15-passenger vans.

Additional safety training is provided by Safety including but not limited to: Emergency Action Plan, portable fire extinguisher, stop the bleed, etc., as appropriate.

Staff also participate in monthly safety meetings and an employee-led Safety Committee.

7.2.2 Lifeguards

Lifeguards are required to participate in a minimum of 60-minutes of in-service training per week (RULE §265.199).

7.2.3 New Hire Orientation

Currently, all staff hired by the City of Denton completed a city-wide onboarding orientation. This is generally conducted on the first day of employment.

PARD conducts various onboarding training based on the business unit in which the employee is to be working. A formal department onboarding program is currently being developed to provide all Parks and Recreation staff a formal orientation and access to documents and ongoing training opportunities as needed.

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7.2.4 Licensing, Certification, and Qualification

Licensing, certification, and qualification are three methods designed to assure that staff are credentialed, qualified and competent to perform certain occupations. All licenses, certification and qualifications are tracked by Parks Business Administration staff to assure all certification and training is tracked and up to date.

The Employee Development Plan outlines required and desired certification and licensing as well as training opportunities that are planned for the operating year. This plan will be updated annually during the budget process to identify the desired training directed by department administration.

7.3 Incident/Accident Reporting, Investigation, and Trending

Incidents (e.g., injury, illness, motor vehicle, near misses) are reported using the City's incident report form accessed on the Denton HUB or through a mobile app. Supervisors/managers are notified when an incident occurs. Upon submission of an incident form, the Safety Division and/or the Risk Management Division is contacted. Incident information is collected, and witness statements are documented. This information is documented on the incident form and submitted by the PARD supervisor/manager.

Onsite personnel are trained to render first aid until paramedics arrived, as needed.

Incidents are trended for proactive problem identification in service operations. This information is used for assessing performance and identifying where there are weaknesses.

7.4 PARD Standard Operating Procedures

All standard operating procedures are located on the City of Denton internal SharePoint page for easy access for staff from within the department.

7.5 Audits and Inspections

Beginning in 2023, Parks and Recreation is kicking off a new Park Audit initiative. This initiative consists of front-line routine inspections being conducted weekly. These inspections will help staff be accountable for park conditions as well as to record and memorialize maintenance needs. Quarterly, management and staff from other areas of the organization will also conduct Park Audits in order to provide a second set of inspections to the property to help account for items that may have been missed and/or to elevate condition standards. This information will also be used to assist in budgetary requests as needed.

7.5.1 ADA Assessments

A formal ADA Transition Plan was adopted in 2022 by the City of Denton. This plan outlines improvements required across the city in parks, facilities, streets, and sidewalks. Each facility has a completed detailed assessment outlining the specific tasks that are out of compliance. Staff in numerous departments are utilizing these reports

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and prioritization to create annual work plans. A reoccurring budget amount is included with the Parks and Recreation Capital Plan that is used as a placeholder for the financial allocation. These work plans are then submitted to City Council during the annual budget process for funding. All assessments can be found at <https://www.cityofdenton.com/874/ADA-Transition-Plan>.

7.5.2 Internal City Audit

The City Auditor's Office is led by the City Auditor who is responsible for directing all internal audit functions for the City of Denton including:

- The Internal Audit Department - Responsible for evaluating City functions to provide advice and recommendations on areas of improvement. A work plan is completed annually that outline areas to be research and evaluated to help recommend changes within city operations.
- The Fraud Response Investigation Committee - Responsible for receiving, managing, and tracking allegations of fraud, waste, and abuse.

The City Auditor website at www.cityofdenton.com, provides in-depth information and outlines the vision, mission, core values, and reporting.

7.5.3 Ethics and Compliance

The City of Denton's Ethics and Compliance team performs periodic department compliance reviews to ensure business and employee practices comply with City policies and key departmental processes and controls.

7.5.4 Routine Audit of Work Areas, Equipment, Tools

In January 2023, a new Park Audit process was launched that tracks regular audits completed by the Parks Maintenance staff. In addition, a separate Park Audit is completed by Parks Managers, Assistant Directors and/or other staff that typically do not work within the park on a regular basis. This provides routine inspections completed by various staff members to see the property from different perspectives.

The purpose of these audits is to enhance the beauty and function of each park / maintained area by calling out any issues that are found and documenting them officially. Each inspection will have an associated numeric scoring that will be used for grading purposes and setting standards. These scores will set a baseline for staff to work from and set achievable goals.

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Park audits include but not limited to the following:

Parks

- Irrigation
- Lighting / Electrical
- Signage
- Parking Lots
- Sidewalks / Trails
- Landscaping
- Trees / Bushes
- Trash / Debris
- Restrooms
- Drinking Fountains
- Pavilions
- Tables / Benches
- Playgrounds
- Other Park Amenities

In addition to Park audits, a similar process will also be conducted for medians. Medians will be inspected on a regular routine by maintenance staff and quarterly by management. Each inspection will have an associated numeric scoring that will be used for grading purposes and setting standards. These scores will set a baseline for staff to work from and set achievable goals.

Medians

- Landscaping
- Trees
- Irrigation
- Mulch
- Turf

Playground Structures

While playground structures are included in the “Park” audit, a more formalized process is completed on a higher frequency. Dedicated staff were hired in the fall of 2022 and awarded an industry-leading certification program in playground safety, the Certified Playground Safety Inspector (CPSI) certification program. The CPSI certification program provides the most comprehensive and up-to-date training on playground safety issues including hazard identification, equipment specifications, surfacing requirements and risk management methods.

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A CPSI conducts "risk evaluation" inspections to determine the frequency of the routine inspections throughout the year for each playground structure. Once the frequency of inspections is determined, each playground is inspected as needed per the Risk Frequency Summary Form as an overview and quarterly per year as a thorough, more involved inspection. The national standard by (NRPA) to thoroughly inspect playgrounds by a CPSI is once per year. However, CPSI inspections are conducted twice per year.

- High frequency playground inspections (separate 2-5 & 5-12)
 - As needed per the Risk Frequency Summary Form
- Low frequency playground inspections (separate 2-5 & 5-12)
 - Quarterly

Additionally, a playground is audited:

- After installation of a new unit.
- After storm damage, other natural disaster & vandalism.
- After substantial upgrade.

Aquatics

- Splash Pads
 - The Carl Young, Sr. Splash Park is considered a "Public Interactive Water Feature" which is governed by the standards referenced below: [https://texreg.sos.state.tx.us/public/readtac\\$ext.ViewTAC?tac_view=5&ti=25&pt=1&ch=265&sch=M&rl=Y](https://texreg.sos.state.tx.us/public/readtac$ext.ViewTAC?tac_view=5&ti=25&pt=1&ch=265&sch=M&rl=Y).
- Pools
 - Properties for the Denton Natatorium, Water Works Park and Civic Center Pool are Class A pools and follow standards set in the Department of Health and Human Services state code referenced below: [https://texreg.sos.state.tx.us/public/readtac\\$ext.TacPage?sl=R&app=9&p_dir=&p_rloc=&p_tloc=&p_ploc=&pg=1&p_tac=&ti=25&pt=1&ch=265&rl=193](https://texreg.sos.state.tx.us/public/readtac$ext.TacPage?sl=R&app=9&p_dir=&p_rloc=&p_tloc=&p_ploc=&pg=1&p_tac=&ti=25&pt=1&ch=265&rl=193).

Vehicles & Trailers (When used) – Parks Maintenance

- Inspected Daily – Walk around
- Inspected Yearly – State Inspection

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- Walk Around 360 For Safety Program – Requires someone to back the driver up when there are two or more people riding in the same vehicle. This process will assist in preventing vehicular collisions while backing up.

Emergency Response Aids

- Panic Buttons

Panic buttons are located at the front desk area of each recreation center and are tested quarterly.

- Fire Extinguishers

Fire extinguishers are placed according to building fire code.

- AED

AEDs are routinely checked to verify battery and pads are in working order. The City is in the process of updating AEDs to Wi-Fi AEDs which perform a daily check. A report is sent to the department monthly unless the system detects an issue. If an issue is detected, a report is sent upon detection. The non-Wi-Fi AEDs are checked monthly. The electrician has an AED located in the vehicle. This AED is checked monthly since there is no Wi-Fi access.

- First Aid Cabinets

First aid cabinets are installed at some facilities. They are inspected monthly by a third-party vendor.

- Emergency Kits

Emergency Kits are inspected monthly. AEDs are checked to see if the battery is in working order. The emergency kits are restocked as needed.

- Safety Shower and Eyewash

All safety showers and eyewashes are inspected monthly except in some circumstances where the hazard is removed during off-season. The safety showers and eyewashes for these areas are locked and tagged out until the start of the new season.

7.6 Medical/Health Exams

The City of Denton requires certain employees, as determined by the job description, to be examined by a physician.

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Medical examinations may be used to ensure that employees remain in good physical condition to perform the demands of the job.

As a condition of employment, and based upon job requirements, all prospective or transferring employees may be required to pass a physical examination administered by a physician designated by the City of Denton.

Employees may be required to have a physical examination on other occasions, such as in-house advancement.

For all positions, a drug test is required after a job offer has been made prior to beginning employment with the City of Denton.

The City of Denton complies with all applicable laws, including the Americans with Disabilities Act (ADA). It is the policy of the City of Denton that qualified individuals with disabilities are not discriminated against because of their disabilities regarding job application procedures, hiring, and other terms and conditions of employment. It is further the policy of the City of Denton to provide reasonable accommodations to qualified individuals with disabilities in all aspects of the employment process. The City of Denton is prepared to modify or adjust the job application process or the job or work environment to make reasonable accommodations to the known physical or mental limitations of the applicant or employee to enable the applicant or employee to be considered for the position he or she desires, to perform the essential functions of the position in question, or to enjoy equal benefits and privileges of employment as are enjoyed by other similarly situated employees without disabilities unless the accommodation will impose an undue hardship.

7.7 State and Local Safety Mandates

Denton Parks and Recreation abides by all safety related mandates from regulatory agencies at the state and/or local level.

8. HUMAN RESOURCES POLICIES

The City has general employment policies and directives that employees must abide by, including policies that address personnel matters (such as standards of conduct for employees), health and safety items, and risk management matters. The safety policies set out the general approach to health and safety. It explains how the city will manage health and safety, clearly stating who does what, when and how.

The following is a subset of relevant policies. The full library of policies is available to all employees through the City's internal SharePoint site and the external City of Denton website.

8.1 Occupational Health and Safety Policies

- City Policy No. 410.01 Health, Safety and Environmental Policy
- City Policy No. 410.02 Stop Work Authority

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- City Policy No. 410.03 Hazard Communication Directive
- City Policy No. 410.05 Hearing Conservation
- City Policy No. 410.06 Respiratory Protection
- City Policy No. 410.07 Confined Space Entry
- City Policy No. 410.08 Excavating, Trenching, and Shoring
- City Policy No. 410.013 Safety Manual

8.2 Risk Management Policies

- City Policy No. 409.01 Workers' Compensation and Salary Continuation
- City Policy No. 409.05 Comprehensive Driving and Vehicle Use

8.3 Standards of Conduct for Employees

- City Policy No. 108.05 Workplace Violence Prevention
- City Policy No. 108.07 Dress Code/Personal Appearance
- City Policy No. 108.10 Harassment Prevention
- City Policy No. 108.11 Drug and Alcohol-Free Workplace
- City Policy No. 108.12 Anti-Substance Abuse and Rehabilitation

8.4 Discipline and Separation Policies

- City Policy No. 109.01 Corrective Action
- City Policy No. 109.02 Demotions

8.5 Vehicle Maintenance

- City Policy No. 508.01 Contact Persons for Vehicle Repairs and Maintenance

9. SUPERVISORY FUNCTIONS

The reporting structure for the Leisure Services and Park Maintenance Divisions of the Parks and Recreation Department are laid out in their respective organizational charts. Both divisions are supervised by the Director of Parks and Recreation.

The Department's Continuity of Operations Plan (COOP) lists key decision-makers (by position) and their successors to whom authority is transferred to, under which circumstances, and when that authority is activated and terminated.

Employees are responsible for performing their jobs in a safe, productive, and effective manner and in compliance with the instructions and standards established by their supervisors and the City of Denton Standards of Conduct for Employees as outlined in Section 108 of the City of Denton Policies and Procedures Manual. The standards of conduct and expectations include Policy 108.07 Dress Code/Personal Appearance and Policy 108.11 Drug and Alcohol-Free Workplace among others.

The Corrective Action policy (no. 109.01) outlines the progressive discipline model used to help maintain an effective, productive, and disciplined workforce that delivers outstanding quality services

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to the citizens of Denton. Policy 109.01 (Corrective Actions) and Policy 109.02 (Demotions) further outline possible disciplinary actions that may be taken for employees who do not meet standards of conduct.

The policies related to the standards of conduct for employees, corrective action, and separation from the City are included in the Employee Handbook and reviewed with employees upon hire.

An HR Business Partner from the Human Resource department is assigned to assist supervisory staff with the corrective action process. The HR Business Partner provides the supervisor with the tools necessary to document an issue and apply the appropriate corrective action. These may include a Performance Improvement Plan, a Memo of Expectations, or other corrective action (e.g., reprimand, suspension, termination).

10. EMERGENCY PLANS AND PROCEDURES

10.1 Building or Facility Specific Emergency Action Plan

The City has a General Emergency Action Plan (EAP) for city buildings and facilities. The Plan defines accountabilities, emergency contacts and reporting to be used in the event of an emergency. It states specific requirements to be documented for each building or facility including:

- Identification of Emergency Action Coordinators.
- Evacuation Plans with evacuation routes, designated assembly areas and accounting for employees.
- Identification of a shelter-in-place.
- Requirement to develop a plan for any employees requiring assistance to evacuate.

The Plan also outlines general emergency response procedures for medical and fire emergencies, severe weather guidelines, how to respond to bomb threats, hazardous material incidents, workplace violence and active shooter.

Building or facility specific emergency preparedness and response information is documented in the City's EAP in Appendix C - Parks and Recreation and Appendix D – Parks Maintenance.

See the City of Denton General Emergency Action Plan.

10.2 Large-Scale Emergencies

The City has an Emergency Management Office that maintains an Emergency Management Plan for the City and its interactions with county, state, and federal authorities, as appropriate. The Plan applies to all local officials, departments, and agencies. The primary audience includes chief elected official and other elected officials, the emergency management staff, department and agency heads and their senior staff members, leaders of local volunteer organizations that support emergency operations, and others who may participate in mitigation, preparedness, response, and recovery efforts.

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The City adopted the National Incident Management System (NIMS) in accordance with the President’s Homeland Security Directive (HSPD-5) to provide a consistent approach to the effective management of situations involving natural or man-made disasters or terrorism. In the event of an Incident of National Significance, as defined in HSPD-5, the City will integrate all operations with all levels of government, private sector, and nongovernmental organizations by the National Response Framework (NRF) coordinating structures, processes, and protocols.

Coordinated drills are conducted on a regular basis.

See the City of Denton Emergency Management Plan.

10.3 In-Service Training for Staff on General Security and Emergency Management

Direct supervisors provide area-specific training for all full-time, part-time, and seasonal employees upon hire and conduct ongoing training to ensure the team member stays current and knowledgeable in all aspects of their position.

The City’s Safety Team provides general safety training, both in person and virtually, regularly to all employees. A variety of safety related training are also available to all employees on the City’s virtual training platform, NeoGov.

Additionally, specific department staff have been identified to receive additional emergency management training to be able to respond in emergency situations:

- EOC Staff Tabletop Exercise: Director, Assistant Director- PM, Assistant Director- LS
- EMI K0419 Shelter Training- Assistant Director-LS, Program Area Manager- LS, Program and Events Manager, Recreation Supervisor-MLK Rec Center
- NIMS Training- Assistant Director-LS, Program Area Manager- LS, Program and Events Manager,

10.4 Emergency Risk Communications Plan

Annex I of the City’s Emergency Management Plan focuses on Public Information and provides a "process by which the City of Denton will provide appropriate information and instructions to the public during emergency situations" (Annex I – Public Information, I-4). The document provides definitions of an emergency and outlines departmental responsibilities and specific protocols for communicating during a public emergency making use of the City’s emergency apparatuses such as the Emergency Alert System. The document also emphasizes the centralization of communication through the Public Information Officer who coordinates closely with the Incident Commander once the Emergency Operations Center (EOC) has been activated during a public emergency.

Other aspects of the City’s emergency communications are detailed in Annex A of the Emergency Management Plan. Annex A “provide[s] a framework for a coordinated warning effort to emergency incidents in the City of Denton” (Annex A, Warning, City of Denton Emergency Management Plan).

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The Annex reviews the various local, state, and national emergency communications systems that the City may require in an emergency. Annex A also reviews the City's protocol for communicating with the public and ensuring that communication remains streamlined and coherent, emerging from the City's designated Local Warning Point at the City's Emergency Operations Center. The emergency management division manages the Alert Denton system, which transmits mass notifications in the event of an emergency.

Individual facilities may have additional local means of communicating an emergency. This information is documented in the facility's Appendix to the City's Emergency Action Plan.

10.5 Care and Shelter Procedures

The City of Denton has formal agreements with several agencies and organizations to provide care and shelter to those in need during disasters or emergencies. Annex C of the Emergency Management Plan outlines the procedures for care and sheltering during an emergency, and the Parks and Recreation Department's roles and responsibilities in managing and staffing city shelters.

The Parks and Recreation Department has an SOP for Warming Center Operations at the MLK Recreation Center. The Warming Center SOP is intended for use by Parks and Recreation staff as a guide to operate a warming center at the MLK Recreation Center as activated by City of Denton City Management. This SOP is solely intended to guide staff in Warming Center operations only and is not intended to be inclusive of the entire coordinated emergency operations response from the City (such as public communication, ice and snow removal, etc.).

Individual facilities have additional local shelter-in-place procedures. This information is documented in the facility's Appendix to the City's Emergency Action Plan.

11. PROTECTIONS AGAINST CRIMINAL ACTS AND SECURITY

The Parks department's Emergency Action Plan (EAP) acts as the general security plan. The EAP is standardized with minor adjustments to reflect features at specific facility sites. The EAP contains information on fire alarm and fire suppression systems and outlines emergency evacuation and critical incident response procedures. Staff routinely train on the plan's elements, which are available at each facility.

Each facility also has a separate procedure for opening and closing which details staff assignments for unlocking and locking the facility and for operating each facility's security system. These facility-specific procedures also include operational processes and guidelines for general safety.

12. TRANSPORTATION AND VEHICLES

The City of Denton employs the following related to the assignment, operation, and maintenance of City vehicles.

- City Policy No. 508.01 Contact Persons for Vehicle Repairs and Maintenance.

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- City Policy No. 409.05 Comprehensive Driving and Vehicle Use.

Responsibility is assigned to an individual or division in Parks to function as the contact person with Fleet Services for all repairs and maintenance. This person will also coordinate the vehicles usage schedule, ensure completion and retention of all inspection checklists, coordinate any applicable training with the Safety team and ensure completion of required safety trainings by self or division staff. These contact persons in Parks include:

- Administration vehicles – Gary Green
- Recreation vehicles – Sara Farris
- Maintenance vehicles – Gary Green
- Maintenance equipment – Fince Espinoza

Personnel driving city vehicles must follow the requirements outlined in City Policy No. 409.05 Comprehensive Driving and Vehicle Use.

13. EQUIPMENT

The Procurement Department is the centralized purchasing authority for the City of Denton. It is responsible for supporting all City departments in contracting for goods, services, professional services, and public works. In accordance with Denton City Code Section 10-26, the City Council has delegated procurement authority to the Procurement Department's Director (referred to as the “purchasing agent”) and the City Manager. Except as otherwise precluded by state and local law or the Procurement Policy, the Procurement Department's Director serves as the central procurement and contracting authority of the City. The Procurement Department's Director has full authority to delegate procurement authority to designees or any department or official of the City.

The City's Procurement Policy and the Procurement Policy Manual serve as guides to staff who are engaged in procurement activity. The manual provides departments with critical information on each of the listed phases of the procurement process, which include “planning, sourcing, contracting, contract administration, and surplus disposition.” Furthermore, the Procurement Policy Handbook explains that all procurement efforts are informed by the values of “accountability, ethics, impartiality, professionalism, service and transparency”. Among the touchstones of professional procurement listed in the Policy Manual are the following:

- Ensuring compliance with local, state, and federal laws applicable to procurement and contracting.
- Providing all suppliers, including Historically Under-utilized Businesses, equal access to the City's competitive processes for the acquisition of goods, services, professional services and public works.
- Protecting the interests of City taxpayers by avoiding any undue influence, political pressures and protecting the integrity of the procurement process. (City of Denton Procurement Policy Manual, 2020).

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The Procurement Policy Manual also endorses interlocal agreements and cooperative purchasing as ways to purchase various products and services. The City also includes term contracts for the procurement of multiple products and services in accordance with Texas Local Government Code 271.102 that allows staff to "piggyback" on other government entities' contracts that contain a cooperative contract provision. A list of all current contracts can be found on the Cities SharePoint page for staff to review.

The City delineates its policy for cash management within the City's Policies and Procedures Manual (see City of Denton, Policies and Procedures, Section 403.01, Cash Handling Regulations). The regulation of petty cash is discussed in Part X of this document.

The City's Procurement Policy, as described in the Procurement Policy Manual, also includes provisions for using purchasing cards (P-cards) for "micro purchases" – goods and services with a value of under \$3000. Staff purchases using P-cards are additionally governed by the City's Procurement Card Manual, which emphasizes the use of P-cards in those instances when doing so results in "significant savings for the City or increases the efficiency and effectiveness of delivering a public service or is due to an unforeseen or urgent situation" (see Purchasing Card Manual, p. 1).

The Procurement Department's Director, in consultation with the City Attorney, is responsible for the interpretation of the Procurement Policy and any related questions. The City Manager has final authority to resolve any issues about the interpretation and application of the City's Procurement Policy.

Equipment

Equipment provided for participant use that, even when operated correctly, could lead to potential harm, injury or death will be inspected regularly for damage and necessary repairs. An inspection schedule and checklist are developed using the manufacturer's guidelines and safety manuals for this equipment. Orientations for fit and use are also provided to participants.

Examples of such equipment include:

- Adapted Equipment (e.g., adapted wheelchair, overcomer).
- Commercial Fitness Equipment (e.g., treadmills, weight machines).
- Indoor Rock-Climbing Wall.
- Inflatables/Bounce Houses.
- Outdoor Equipment (e.g., mountain bikes, kayaks).

14. ENVIRONMENTAL CONDITIONS

14.1 Mountain Bike Trails

Trails are created by staff and volunteers (after they've been trained by staff). Staff works in conjunction with the volunteers to clear brush and debris from the proposed trail paths to ensure

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they're safe for the public to use. Staff also creates and installs wayfinding and warning signs throughout the area.

14.2 Undeveloped / Natural Land

Clear Creek Natural Heritage Center – is located within Lake Lewisville's upper floodplain and managed by the City of Denton. It provides residents and visitors with unmatched ecological, educational, and recreational opportunities. Clear Creek Natural Heritage Area includes the confluence of Clear Creek and the Elm Fork of the Trinity River and was originally established to protect and restore rare bottomland and upland prairie ecosystems. The city leases the land from the U.S. Army Corps of Engineers and is responsible for operation and maintenance of Clear Creek Natural Heritage Area. The city has staff on site during the regular work week to ensure the safety of the public and maintains the preserve.

In conjunction with the Denton Fire Department, controlled burns are prescribed to prevent uncontrolled fires throughout the summer months. The Denton Fire Department pulls permits to perform this task and they also use it for training opportunities for their staff.

14.3 Privet Removal

In conjunction with the Environmental Services Department, Parks and Recreation staff coordinate efforts to remove the privet throughout some undeveloped areas. The removal of the privet is necessary for a few reasons.

1. The privet chokes out the understory and eliminates the natural flora from growing.
2. The privet changes the usual ecosystem that fauna is used to, so they're ultimately displaced.
3. The privet prevents the seeds from the parent plants from growing thus, eliminating future specimens from growing.
4. The privet is so dense, it allows for people experiencing homelessness to set up camps and become undetected.

See privet removal procedures for more details.

15. DEVELOPED AREAS AND FACILITIES

Developed areas are included in the audit and inspection system described in Section 7.5 above. The Facilities Department is responsible for inspecting and maintaining all city owned buildings including but not limited to recreation centers, libraries, administration buildings, etc. Any defects or hazardous conditions are recorded within an asset management system as a maintenance, repair, or project request to be addressed by Facilities staff and tracked to closure. Routine inspections are conducted and recorded on all vital systems and assets such as HVAC, generators, and roofing. Additional inspections

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are conducted during high-risk weather events to mitigate and efficiently respond to any potential damage to HVAC, security, and plumbing systems.

15.1 Lighting

Lighting within parks vary from area lighting for general park use to more specialized lighting specifically designed for athletic field use.

- Athletic fields are equipped with 630-watt 5000 kelvin LED lamps arranged in a way to produce Texas UIL light intensity standards for each field. This measurement is taken at various locations on each playing field to ensure that baseball/softball fields have a light intensity of 50 footcandles infield and 30 footcandles outfield and football/soccer fields have a light intensity of 30 footcandles. These lights are inspected monthly by park staff and monitored daily through web-based software.
- General lighting within parks consists of security lighting, trail lighting, accent lighting, structure lighting.
 - Security lighting typically consists of standard dusk to dawn LED fixtures to provide nonspecific levels of lighting in general park areas for navigation after dark.
 - Trail lighting consists of both security lighting and motion sensing solar LED lighting, solar lighting is utilized when electricity is unavailable, or the area is prone to flooding.
 - Accent lighting is used to illuminate artwork, signs or create ambiance. These includes both high and low voltage up lighting, tree lighting and café string lighting.
 - Structure lighting consists of restroom, pavilion or specific park element lighting. Restrooms and pavilions are equipped with LED canopy lights that are set to be operated to from dusk till dawn. Specific element lighting typically is used for items such as skate parks, outdoor basketball courts, tennis courts etc. These consist of LED fixtures arranged in a manner to produce an average of 50 footcandles in the use area.

All lighting is inspected by Park Maintenance staff monthly and repaired as needed. Citizens are also provided with an online reporting tool to inform staff of any system malfunctions or outages that can be used on any device with web access.

15.2 Signage

At time of the publication of the Risk Management Plan a formal standard process for signage has not been developed. Sign are placed within the park system strategically as needed to assist with the communication of rules, regulations and various city ordinances. Signage is also used for site location, direction, placement, historical interpretation, and more.

It is the desire of the Parks and Recreation Department to create a more formalized sign manual to provide guidance when signage is needed. This process would create a systematic process

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that follows desired outcomes to include intended message as well as the design, color, font, size, etc.

15.3 Sanitation

Park litter containers are inspected and emptied on a regular basis throughout the park system. Litter cans are checked twice per week with recycling collected weekly.

In 2022, new litter and recycling receptacles were placed throughout the park system. These new amenities were purchased with the assistance of a North Central Texas Council of Governments grant. A pair of receptacles are strategically placed within the park property that is aimed at capturing litter as well as improving city recycling. Up until late 2022, recycling was not conducted within the park system due to the high level of contamination within the recycling containers that were in place at the time. Regular recycling audits are being completed by Solid Waste to review anticipated progress of recycling efforts.

15.4 Lightning Detection System

The City of Denton Parks and Recreation Department currently uses equipment manufactured by Perry Weather as a lightning warning system for park users. This system monitors weather conditions and detects lightning. When a lightning strike is detected within a 10-mile radius of the unit location an air horn alarm will sound for 15 seconds, along with flashing amber lights. The system will continue to flash and remain in alarm until a 30-minute segment of time passes with no lightning detected within 10 miles. When these conditions are met the flashing light will go off and the air horn will sound three 5 second bursts, this signals users that it is all clear and their outdoor activities can be resumed. These units are in 13 locations throughout the City of Denton that typically attract larger groups such as athletic fields, aquatic amenity locations and heavily used neighborhood parks.

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16. REVIEW

This Risk Management Plan shall be reviewed every three years at a minimum, or with any significant change in staffing and/or information. An annual review would be preferred so staff can continually improve and comprehend the ability to mitigate risk as much as feasible while offering the highest quality programs and services. Records shall be maintained according to the records retention policy.

Role	Name	Position	DocuSigned by:
Review, Input, Comprehend	Gary Packan	Director	<i>Gary Packan</i> DocuSigned by:
Review, Input, Comprehend	Nikki Sassenus	Asst Director	<i>Nikki Sassenus</i> DocuSigned by:
Review, Input, Comprehend	Fince Espinoza	Asst Director	<i>Fince Espinoza</i> DocuSigned by:
Review, Input, Comprehend	Caroline Seward	Business Administration Mgr	<i>Caroline Seward</i> DocuSigned by:
Review, Input, Comprehend	Craig Arrington	Park Manager	<i>Craig Arrington</i> DocuSigned by:
Review, Input, Comprehend	Russell Koch	Park Manager	<i>Koch, Russell</i> DocuSigned by:
Review, Input, Comprehend	Marshall McGee	Park Manager	<i>Marshall McGee</i> DocuSigned by:
Review, Input, Comprehend	Megan Thomas	Program Area Mgr.	<i>Megan Thomas</i> DocuSigned by:
Review, Input, Comprehend	Monica Martin	Program Area Mgr.	<i>Monica Martin</i> DocuSigned by:
Review, Input, Comprehend	Autumn Natalie	Programs/Events Mgr.	<i>Autumn Natalie</i> DocuSigned by:
Review, Input, Comprehend	Jason Barrow	Athletics Manager	<i>Jason Barrow</i> DocuSigned by:
Review, Input, Comprehend	Jason Donnell	Senior Park Planner	<i>Jason Donnell</i> DocuSigned by:
Review and Input	Tiffany Harris	Senior Risk Analyst	<i>Tiffany Harris</i> DocuSigned by:
Review and Input	Deby Skawinski	Deputy Director of Risk & Compliance	<i>Deby Skawinski</i> DocuSigned by:
Review and Input	Sarah Kuechler	Director of Human Resources	<i>Sarah Kuechler</i> DocuSigned by: 88642FE9664D44D...

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17. REVISION HISTORY

Current Version Approval Record

Revision History Record

Rev#	Revision Date	Modification Reason	Modification Description	Section/ Paragraph
0	12-13-22	Initial version	Misti Jefferson	All
1	02-1-23	Final version	Misti Jefferson	All