

SAINT MARY'S COLLEGE OF CALIFORNIA
INJURY AND ILLNESS PREVENTION PROGRAM (IIPP)

January 2020



Saint Mary's College of California
1928 St. Mary's Road
Moraga, CA 94556

Effective Date: January 2015 - Released By: Safa Toma, Director of EH&S		
Change History	Date	Brief Description of Change
Revision 0	2003	New Document
Revisions 1-2	2004-2013	Various Unknown Changes
Revision 3	January 2015 January 2016 – no change	Major Revision Update – added TOC, responsibilities, Injury reporting and investigation forms, and various other changes.
Revision 4	January 2017	Minor updates – updated identification of the specific workplace hazards employees are exposed to
Revision 5	January 2018	Minor updates and corrections
Revision 6	January 2019	Minor updates and corrections
Revision 7	January 2020	No Changes

Table of Contents

1	Statement	1
2	Responsibilities	2
2.1	Management	2
2.2	Human Resources	2
2.3	IIPP Coordinator	2
2.4	Supervisors	3
2.5	Employees	3
2.6	Contractors	4
3	Identification of Workplace Hazards	4
3.1	Routine Inspections	4
3.2	New Equipment and Process Reviews	4
3.3	Standard Operating Procedures (SOPs)	5
3.4	Identify the specific workplace hazards employees are exposed to	5
4	Accident Investigations and Response	5
4.1	Accident Investigations	5
4.2	Injury and Illness Response and Corrective Action Process	6
4.3	Accommodating Medical Restrictions	7
5	Employee Communications	8
5.1	Employee/Management Communication	8
5.2	Communication Policy and Safety Rules	8
5.3	Employee Compliance and Safety Concerns	8
6	Training and Employee Information	9
6.1	General Safety Information	9
6.2	Additional Training	9

Injury and Illness Prevention Program

7	Recordkeeping and Documentation	10
7.1	Inspection Records	10
7.2	Training Records	10
7.3	Medical Records	10
7.4	Accident Investigation & Employee Complaints	10
7.5	EH&S Records	10
8	Program Audit and Review	11

Attachments

Appendix 1: Safety Inspection Form

Appendix 2: Accident Investigation Form

Appendix 3: Injury/Illness Response Process

Appendix 4: Report of Occupational Injury or Illness

1 Statement

Saint Mary's College of California (SMC or College) will provide a safe and healthy work environment for employees. In order to prevent accidents and injuries in the workplace, SMC has developed and implemented this Injury and Illness Prevention Program (IIPP), which applies to employees working at the College campuses.

Employees are expected to follow safety rules and established safe work practices, and to exercise caution in their work activities. If an unsafe condition arises, employees are to report the condition to their Supervisor immediately for correction.

2 Responsibilities

2.1 Management

- Allocates resources necessary to provide a safe and healthy working environment
- Provides leadership by active participation and through a demonstrated interest in the Environmental, Health, and Safety (EH&S) program
- Approves health and safety policies

2.2 Human Resources

- Manage or oversee the workers' compensation process
- Retain employee health records in a confidential separate medical files for the term of employment, plus 30 years
- Provide information regarding workers' compensation to new employees at the time of hire
- Explain workers' compensation benefits (temporary disability payments, mileage, medical & therapy fees, medical visits on work time) and restrictions
- Develop and distribute procedures for accident reporting and accident investigations and assist Supervisors with investigating and documenting accidents

2.3 IIPP Coordinator

- Develop and implement health and safety programs for the College
- Develop and distribute procedures for inspection, emergency preparedness and response
- Coordinate periodic work area inspections and maintain corrective action plans and records
- Ensure that issues identified in area inspections have been corrected in a timely manner
- Maintain Material Safety Data Sheets (MSDS), or Safety Data Sheets (SDS)
- Maintain copies of EH&S-related documentation
- Maintain individual employee health and safety-related training records
- Participate in accident investigations to identify causative factors and recommend corrective actions to Management for implementation
- Work with Supervisors to investigate accidents/incidents promptly and finalize the Accident Investigation Report and file it
- Ensure that medical restrictions are accommodated wherever possible
- Identify and secure additional resources (i.e., contractors, consultants, auditors, etc.) as needed to achieve SMC's EH&S goals and objectives

2.4 Supervisors

- Train employees on the specific hazards associated with their work areas, and document training
- Assign tasks to employees only after they have completed adequate safety training
- Familiarize employees with emergency procedures
- Reinforce training by monitoring the activities of employees for unsafe acts and implement corrective action as necessary
- Promptly address any safety concerns and issues that arise
- Procure the appropriate personal protective equipment, equipment and materials required for safe work
- Ensure that area housekeeping practices are maintained
- Investigate accidents/incidents promptly and submit Accident Investigation Report to the IIPP Coordinator
- Communicate general safety requirements to new and transferred employees
- Perform periodic safety inspections of facilities and job sites to identify deficiencies and recommend corrective actions to implement
- Participate in accident investigations to identify causative factors and recommend corrective actions for implementation
- Review the potential hazards of new equipment, processes, and materials (e.g., chemicals) and recommend control measures
- Ensure the safe design, operation, and maintenance of facility equipment (e.g., HVAC, plumbing, and electrical)
- Serve as a conduit for communication of safety-related issues between employees and IIPP Coordinator

2.5 Employees

- Promptly report accidents, unsafe conditions and unsafe acts to their Supervisor
- Suggest solutions to improve the safety of the process, equipment, or the building
- Obtain information about Environmental Health and Safety procedures from their Supervisor
- Attend health and safety training classes as required
- Be familiar with emergency and evacuation procedures
- Know the location of safety and emergency equipment and how to operate it
- Maintain their personal work areas in accordance with housekeeping guidelines
- Wear required personal protective equipment

2.6 Contractors

Contractors are responsible for the safety of their own actions, utilizing their own personal protective equipment and for complying with this Injury and Illness Prevention Program while working on Campus.

3 Identification of Workplace Hazards

SMC uses the following methods for identifying, evaluating, and preventing occupational health and safety hazards:

- Routine inspections of work areas at job sites
- New equipment and process reviews
- Standard Operating Procedures (SOP)

3.1 Routine Inspections

Periodic safety inspections are completed by College personnel to identify unsafe conditions and work practices (Appendix 1). Inspections are performed:

- Monthly or quarterly by SMC safety representative
- Whenever new substances, processes, procedures, or equipment are introduced to the workplace that may represent a new hazard
- Whenever the College is made aware of a new or previously-unrecognized hazard

SMC's intent is to abate any recognized hazard which presents risk or imminent harm. When the College is unable to abate the hazard without potentially endangering employees or property, all personnel except those necessary to correct the condition will be removed from the area until the hazard can be abated.

Requests for repairs and completion dates shall be assigned to responsible parties and monitored by the IIPP Coordinator.

Records of inspections and reports, including documentation of corrective actions taken, will be retained by the IIPP Coordinator according to Section 7.

3.2 New Equipment and Process Reviews

SMC reviews new equipment and processes for EH&S considerations prior to purchase or installation. SMC reduces the potential for personal injury and environmental impact, and ensures that its facilities are suitable prior to the equipment arriving on site. These steps will be followed to complete the review:

- The IIPP Coordinator reviews new equipment to be brought on site or used by SMC at a job site
- The IIPP Coordinator will review the equipment's facilities requirements and safety features. This review may require technical assistance from a 3rd party
- The IIPP and/or the equipment owner will conduct a safety and operation training to affected employees

3.3 Standard Operating Procedures (SOPs)

SOPs convey step-by-step instructions, process information, safe work conditions, best practices, and protective equipment needed to eliminate or mitigate identified safety and health hazards.

Supervisors will incorporate safety-related elements into SOPs with the assistance of the IIPP Coordinator.

3.4 Identify the specific workplace hazards employees are exposed to

Staff in general: general workplace hazards may include

- Slip, trip and falls – Walking surfaces are maintained and are compliant with building codes
- Ergonomics – An ergonomics program is fully implemented to help employees establish a comfortable workplace

Facilities staff: specific workplace hazards to Facilities staff may include

- Slips, trips and falls – staff is trained annually on the various hazards, including ladder use and fall protection
- Hand and power tools – staff is trained annually on the proper use of these tools
- Electrical and mechanical equipment – staff is trained annually on lockout/tagout, electrical safety and other applicable topics

4 Accident Investigations and Response

4.1 Accident Investigations

Accident investigations determine causal or contributing factors of occupational injuries and illnesses and for use in determining if any action is necessary in order to prevent a recurrence. Investigations are not intended to assign blame on any individual or group of individuals. When an incident occurs, the Supervisor shall conduct an investigation within 24 hours following the

accident/incident whenever possible. A copy of the Injury and Illness Incident Report is found in Appendix 2.

An accident is defined as an unexpected and undesirable event that results in injury or property damage. Accidents that do not result in injury or property damage are referred to as “incidents” or “near hits.”

All accidents involving injury or property damage shall be investigated. Furthermore, near hits that could have produced significant injury or damage should also be investigated.

4.2 Injury and Illness Response and Corrective Action Process

When an employee is injured or when there is a near hit, the employee or co-worker must inform the Supervisor as soon as possible about the event (but within 24 hours), and when necessary, must call emergency services immediately. If a condition exists that may require outside emergency assistance, such as a fire, earthquake, flood, or a chemical spill, employees shall initiate an audible (pull station or paging system) alarm to initiate immediate evacuation of the building by all personnel. Employees will meet at the main assembly area for their building, as described by the building’s emergency evacuation plan.

In the event of minor first aid-type injuries, first aid can be rendered using the first aid kits available onsite. In the case of a serious medical emergency, or if an injury or illness occurs outside of normal working hours, any employee who becomes ill or injured on the job will be immediately transported by an able fellow employee, preferably the employee’s supervisor, to the medical care facility identified in the map in Appendix 3. If transportation is not available, outside emergency medical services can be summoned by calling 911.

The IIPP Coordinator, the Supervisor and the employee will work together to complete an Authorization to Treat form (Appendix 3) and determine the cause of the accident so it can be quickly fixed or determine whether a more detailed corrective action plan is needed. The Supervisor will be responsible for implementing the corrective action plan.

The IIPP Coordinator shall notify Cal-OSHA as soon as reasonably feasible, but no greater than eight (8) hours following a *Serious Injury or Illness*. Serious injury or illness includes:

- Inpatient hospitalization for a period in excess of 24 hours for other than medical observation
- Bodily dismemberment
- Permanent disfigurement
- Death

4.3 Accommodating Medical Restrictions

Any employee returning to work after a medical absence of five (5) or more days is required to bring a Return-to-Work authorization form signed by a physician. Additionally, one copy of the document is to be distributed to the IIPP Coordinator for recordkeeping purposes.

SMC, in coordination with the physician, will assess the feasibility of the employee returning to work based on the employee's health status, and will evaluate the medical restrictions based on knowledge of job requirements.

5 Employee Communications

5.1 Employee/Management Communication

It is SMC's policy that there be open, two-way communication between management and employees, especially with respect to environmental, health and safety issues. No procedures or work practices shall be implemented that impede this communication process.

Employees have been advised that there will be no reprisals for expressing concerns, comments, suggestions, or good faith complaints about a safety-related matter. Furthermore, employees are informed of their other rights and protection under the law, such as:

- Access to their work-related medical records
- Access to Material Safety Data Sheets for chemical use
- Right to refuse unsafe or hazardous work

5.2 Communication Policy and Safety Rules

Communication meetings to discuss aspects of employee safety will be held between management and workers. These meetings can either be dedicated to cover EH&S issues, or can be part of other, regularly scheduled meetings (e.g., all employee meetings, staff meetings, planning meetings, group meetings).

5.3 Employee Compliance and Safety Concerns

Violation of EH&S policies will not be tolerated because of the potentially severe consequences. The outcome of such violations could include:

- Personal injury or illness
- Injury or illness inflicted upon co-workers
- Environmental impact
- Equipment, property, or facility damage
- Business interruption and financial loss

Any violation of EH&S policies may be grounds for disciplinary action up to and including immediate termination.

The College strongly encourages employee participation in the Safety Program. Safety suggestions can be submitted to the safety representative via phone, e-mail, or in person. The safety representative will review all requests at the following scheduled safety meeting.

6 Training and Employee Information

6.1 General Safety Information

The College will provide training and instruction on all specific elements of this IIPP, including evacuation procedures, when:

- The IIPP is first implemented
- New employees are hired
- Employees are given new job assignments for which training has not been previously received
- New processes, procedures, or equipment are introduced into the workplace and represent any new hazard
- SMC is made aware of a previously unrecognized hazard

6.2 Additional Training

Additional training and instruction shall include:

- A review of potential safety and health hazards identified in employee work areas
- Necessary means of minimizing potential hazards, including safe work conditions and work practices
- Instruction on any safety equipment or personal protective equipment or procedures which should be used

Certain individuals may require additional training in specific areas in order to perform their jobs safely. This training may be coordinated and conducted by the Supervisor or a third party resource.

Supervisors are responsible for ensuring that specific job-related safety information is reviewed and documented with an employee on the first day of work. Job-specific safety training done by the Supervisor shall be documented and maintained in the IIPP Coordinator's files.

As job duties and work assignments change, or as new processes, equipment, chemicals, or any other previously unrecognized hazards are observed; additional training may be required on an as-needed basis.

7 Recordkeeping and Documentation

7.1 Inspection Records

Records of periodic work area inspections and corrective action documentation are retained by the IIPP Coordinator for at least three years.

7.2 Training Records

Copies of all health and safety training records are documented and retained by the IIPP Coordinator at least three years.

7.3 Medical Records

Employee medical records shall be handled as follows:

- Medical records will be maintained by Human Resources for the duration of employment plus 30 years
- Confidential and non-confidential employee health records will be kept separately from other company records in a secure location
- Access to confidential health information will be controlled by Human Resources
- SMC will comply with subpoenas while protecting privileged information on litigated files

7.4 Accident Investigation & Employee Complaints

SMC will track all accidents in files containing the Employer's Report of Occupational Injury or Illness with one copy to be filed in the affected employee's medical record.

Accident investigation reports will be kept by the IIPP Coordinator for at least three years. Employee safety complaint records will be kept on file by the IIPP Coordinator of at least 3 years.

7.5 EH&S Records

- Inspection, testing and injury records will be kept on file by the HR Department of at least 30 years
- MSDS/SDS and hazard communication records shall be kept as long as the material is in use

8 Program Audit and Review

SMC's IIPP Coordinator reviews the Injury & Illness Prevention Program annually to ensure that the program reflects current company policies and practices, accurately describes management responsibilities, and incorporates any process or facility changes that have occurred.

Appendix 1: Safety Inspection Form

Appendix 2: Injury and Illness Incident Report

Accident and Incident Investigation Form Guidelines

The goal of an accident/incident investigation is to determine the root cause of *all actual and near miss* injuries, chemical exposures, damage to equipment / property and ergonomic issues, so that recurrence can be prevented. An “accident” generally involves personal injury where an “incident” would involve a chemical spill, property damage, etc. The first few minutes after an accident or incident are critical. Names of personnel involved, names of witnesses and the type, location and time of an accident or incident should be obtained as soon as possible.

Identification

This section of the form is essential for record keeping. Complete each section of the form and do not leave blank items.

Incident

Indicate the nature of the situation. An injury is a physical act that damages or hurts an employee, whereas an illness is an unhealthy state of the body. In the description section include any information you gathered from physical evidence, records review, and/or interviews. If needed, use the back of the form or additional pages to completely describe the accident.

Analysis (Potential Causes)

Once information has been collected the facts must be applied to determine potential causes.

- Material (equipment, hazardous materials, personal protective equipment)
- Environment (lighting weather, housekeeping)
- Personal (experience, training, health status, stress...)
- Management (training, hazard identification, procedures...)
- Task (procedure used, controls, lockout, materials...)
- From these a primary or “root cause” should be identified. If it is determined that there is more than one major cause prioritize each based on its estimated contribution.

Controls

When a primary or root cause has been identified, corrective measures must be documented here to prevent future accidents. An individual must be assigned to implement the plan and set a target completion date. For example, if a slip and fall occurred because there was a need for a slip mat in front of a sink or freezer, then someone must be assigned to coordinate the completion of that task. Once the plan has been completed and verified the form should be signed and dated.

Follow-Up

Once the corrective action has been verified, the IIPP Coordinator should coordinate a meeting after the target completion date to follow up on the effectiveness of the plan. If the plan was not effective, make additional changes for continual improvement and document these recommendations in the follow-up section of the form.

Appendix 3: Authorization to Treat Form

**MAKE A COPY OF THIS REPORT FOR YOUR RECORDS
AND SEND THE ORIGINAL COPY TO THE IIPP COORDINATOR**