

INJURY AND ILLNESS PREVENTION PROGRAM

Dept: _____

UNIVERSITY OF CALIFORNIA
SANTA BARBARA

Written Program Summary: UCSB Injury and Illness Prevention Program

The IIPP is a Cal/OSHA regulation instituted in 1991. In response, EH&S has developed the following written IIPP document. A **summary of the written program** is provided here:

Introduction

- IIPP program coordinates and formalizes existing campus safety programs
- Applies to all campus employees, student workers, volunteers and contractors

Authority and Responsibility

- By customizing the template plan, each department must create their own written plan
- Department Chair/Head has designated authority and responsibility for implementation

Compliance with Safe Work Practices

- Employees must be knowledgeable of, and comply with, applicable safety regulations
- For serious hazards, the EH&S Director may order cessation of a campus activity

Communicating Safety Issues

- Departments must devise system of communicating safety issues to its employees, e.g., bulletin boards, meetings, training programs, written communications, committees, etc.
- Encourage employees to report workplace hazards without fear of reprisal

Identifying Workplace Hazards

- Regular workplace inspections must occur and be documented (forms in Appendix 2)

Procedures for Investigating Injuries and Illnesses

- Workplace injuries must be documented with the appropriate forms (see App. 2)
- Each accident is reported to EH&S for review and appropriate corrective actions

Procedures for Correcting Unsafe or Unhealthy Conditions

- Unsafe or unhealthy conditions will be corrected - in consultation with EH&S if needed

Safety and Health Training

- Each supervisor is responsible for ensuring their employees receive documented training to do their job safely and in compliance with applicable regulations/policies (forms in Appendix 2).

Record Keeping and Documentation

- Records of safety training and inspections/corrections must be maintained for 3 years

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Illness and Injury Prevention Program

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INTRODUCTION

The Injury and Illness Prevention Program is required by California Senate Bill 198 and implemented under the California Code of Regulations, Title 8, Chapter 4, Section 3203. Each department at UCSB is required to have their own written Injury and Illness Prevention Program. The Program covers University employees in all job classifications, including student employees, academic and administrative staff. The legislation also covers all other workers who the employer controls or directs and directly supervises on the job to the extent these workers are exposed to worksite and job assignment specific hazards. Volunteer workers and outside contractors are thus covered under the Illness and Injury Prevention Program. The intent of this legislation is to formalize and coordinate existing health and safety programs at the operational level, such as the Hazard Communication Program, the Campus Emergency Operations Plan, departmental Emergency Action/Fire Prevention Plans and other policies and procedures. The Campus Environmental Health and Safety Office will assist you with this process.

The following statements are taken directly from the Campus Policy on Environmental Health and Safety, P-5400:

POLICY

The University shall maintain as safe and healthy an environment as is reasonably feasible for its students, faculty, staff and visitors by:

Conducting its operations and activities in a safe manner to minimize the risk of injury to people and minimize property damage at all locations where University operations and/or activities occur.

Complying with applicable regulations, safety and health consensus standards, and practices generally accepted by experts in the field.

DEFINITION OF RESPONSIBILITIES

The Vice Chancellors are responsible for ensuring that units under their authority comply with the campus environmental health and safety policy.

Deans, unit heads, principal investigators, and supervisors are accountable for establishing and maintaining programs to ensure compliance within their areas and which will provide a safe and healthy environment.

The Environmental Health and Safety Office (EH&S) is responsible for developing safety education and monitoring programs to ensure compliance with campus environmental health and safety policy. EH&S is authorized to inspect all areas of the campus.

All employees are responsible for knowing the applicable safety regulations governing the activities they carry out and are accountable for complying with them.

AUTHORITY AND RESPONSIBILITY

REQUIREMENT

Standard

Effective July 1, 1991, every employer shall establish, implement and maintain an effective Injury Prevention program (Program). The Program shall ...(1) Identify the person or persons with authority and responsibility for implementing the Program. (8 CCR Section 3203(a)(1).

IMPLEMENTATION

Written Program

The Department's Injury and Illness Prevention Program must be a **written** document that addresses the minimum elements of the standard. The Department Safety Representative generally completes his/her department's IIPP and maintains a copy in the *UCSB Health and Safety Binder* for viewing by department employees and Cal-OSHA. Completion of a written IIPP document can be accomplished by using this document and customizing it to your department by filling-out Appendix 1; identifying your department on the cover; and posting Appendix 1 on the department's Safety Bulletin Board.

Designation of Person or Persons with Authority and Responsibility

The standard clearly requires that the Injury and Illness Prevention Program identify a person or persons with the *authority and responsibility* for implementing the Program. The intent of the standard is to designate a person in management as the person responsible for the Program.

The Department Head or Chair Person is the identified person for the Department. They may elect to delegate tasks for implementation of the Program to someone in their Department but they may not delegate their responsibility for its implementation.

COMPLIANCE WITH SAFE WORK PRACTICES

REQUIREMENT

Standard

The Program shall ... (2) Include a system for ensuring that employees comply with safe and healthy work practices. Substantial compliance with this provision includes recognition of employees who follow safe and healthful work practices, training and retraining programs, disciplinary actions, or any other such means that ensures employee compliance with safe and healthful work practices... (8 CCR Section 3203(a)(2)).

IMPLEMENTATION

Policy

The University of California Santa Barbara Policy on Environmental Health and Safety requires all employees to be knowledgeable of, to comply, and to be accountable for complying with applicable safety regulations governing the activities they carry out. EH&S will provide guidance for compliance with regulations. In the event of a serious hazard, the EH&S Director or their designee may order cessation of an activity on campus, and the activity may only be resumed with the approval of the EH&S Director in consultation with the appropriate Vice Chancellor, Dean and unit head.

References

The following references govern disciplinary action for violation of University Policy:

- Academic Personnel Manual.
- University of California and AFSCME Agreement, Article 8.
- Staff Personnel Policies 720, 730, & 740.
- Administrative & Professional Staff Program Policies 185 & 187.
- Management & Professional Program Policy 85.
- Various Memos of Understandings (MOU) with Unions.

COMMUNICATING SAFETY ISSUES

REQUIREMENT

Standard

The Program shall...(3) Include a system for communicating with employees in a form readily understandable by all affected employees on matters relating to occupational safety and health, including provisions designed to encourage employees to inform the employer of hazards at the worksite without fear of reprisal. Substantial compliance with this provision includes meetings, training programs, posting, written communications, a system of anonymous notification by employees about hazards, labor/management safety and health committees, or any other means that ensures communication with employees. (8 CCR Section 3203(a)(3)).

IMPLEMENTATION

Communication

The department must devise a system for communicating with its employees on safety and health issues that affords employees the opportunity for meaningful and reprisal-free input to the program. The department's communication program must address the following objectives:

1. Explain the requirement to comply with safe work practices, including recognition for compliance and disciplinary actions for violations;
2. Communicate safety rules and other information on occupational hazards in an understandable manner (this requirement applies to both clarity and language if non-English speaking employees are in the workforce); and
3. Encourage employees to report workplace hazards to EH&S by using the Hazard Reporting Form (see Appendix 2).

Methods

The department may use the following methods for facilitating safety and health communication:

1. Designated safety and health bulletin boards (established and maintained by Department Safety Representatives - where all safety forms, such as *Hazard Reporting Form*, located;
2. Staff meetings;
3. Training programs
4. Written communications (memos, newsletters, "93106", signage, pamphlets, etc.);
5. *UCSB Health and Safety Binder* - to be maintained and kept accessible by the Department Safety Representative containing all health and safety reference material, i.e., Injury and Illness Prevention Plan, Department Emergency Operations Plan, etc.
6. Department Safety and Health Committee.

The following are guidelines for departments that choose to utilize a Safety and Health Committee:

- members are to be appointed by the Department Chair;
- the Department Safety Representative should be a member of the Committee
- the committee should request and review EH&S's investigations of accidents/illnesses/injuries, and submit recommendations to management and EH&S.
- should meet at least quarterly.
- should keep and distribute meeting minutes.

Note: The departmental safety committee described above is for the communication of safety issues and is not intended to fulfill the requirements of a Labor /Management safety and health committee, as described in the Cal/OSHA Standard.

IDENTIFYING WORK PLACE HAZARDS

REQUIREMENT

Standard

The Program shall...(4) Include procedures for identifying and evaluating work place hazards including scheduled periodic inspections to identify unsafe conditions and work practices. Inspections shall be made to identify and evaluate hazards.

- (A) *When the Program is first established;*
- (B) *Whenever new substances, processes, procedures, or equipment are introduced to the workplace that represent a new occupational safety and health hazard and*
- (C) *Whenever the employer is made aware of new or previously unrecognized hazard.(8 CCR Section 3203 (a)(4)).*

IMPLEMENTATION

Inspections

Appendix 2 gives directions to workplace self-inspection forms for Offices, Laboratories and Shops/Trades areas. These checklists, or equivalent forms, must be used by individual supervisors in regular self-inspections of their work areas. The frequency of supervisor inspections should be at least annually, but depend on additional factors such as the operations involved, the magnitude of the hazards, the proficiency of employees, changes in equipment or work processes, and the history of workplace injuries and illness.

The Environmental Health and Safety Office conducts periodic safety surveys of selected areas (e.g. labs) on campus and sends their results to the supervisor and department administration.

Documentation

Records of the self-inspections must be retained by the supervisor for at least three years. Individual departments may also choose to keep centralized copies of the inspection reports done within their department.

PROCEDURES FOR INVESTIGATING INJURIES AND ILLNESSES

REQUIREMENT

Standard

The Program shall..(5) Include a procedure to investigate occupational injury or occupational illness (8 CCR Section 3203(a)(5).)

IMPLEMENTATION

Department's Responsibility

According to Workers' Compensation Claim Reporting Procedures, California law requires that each industrially-injured employee receive from their supervisor an "Employee Claim for Workers' Compensation Benefits Form" within one working day of the time the injury is reported to the employer, along with a University letter confirming receipt of this form by the employee. The supervisor must also complete the "Report of Injury to Employee" form within 24hours of knowledge of the injury. These forms are obtained from Business Services at x4440, or see Appendix 2.

Environmental Health and Safety's Responsibility

All injuries to employees are reported to the Workers' Compensation Program Coordinator in the Business Services Office via the forms noted above. A copy of this "Report of Injury to Employee" form is sent to Environmental Health and Safety for review and follow-up where appropriate. Corrective actions are identified and addressed to prevent a recurrence of the accident . Departments may request the results from EH&S's investigations of accidents. Accident trends are also evaluated from statistical data to identify training requirements.

PROCEDURES FOR CORRECTING UNSAFE OR UNHEALTHY CONDITIONS

REQUIREMENT

Standard

The program shall...(6) Include methods and/or procedures for correcting unsafe or unhealthy conditions, work practices and work procedures in a timely manner based on the severity of the hazard:

- (A) *When observed or discovered; and*
- (B) *When an imminent hazard exists which cannot be immediately abated without endangering employee(s) and/or property, remove all exposed personnel from the area except those necessary to correct the existing condition. Employees necessary to correct the hazardous condition shall be provided the necessary safeguards.(8 CCR Section (a)(6).*

IMPLEMENTATION

Inspections

As noted above, periodic inspections and procedures for correction and control provide a method of identifying existing or potential hazards in the workplace, and eliminating or controlling them. Corrective actions will include such measures as operational changes, physical changes, work orders, training sessions, minor state-funded capital improvements, etc. Environmental Health & Safety can assist in discussing appropriate options. Unsafe conditions which cannot be corrected by the supervisor must be reported to the next highest level of management and EH&S.

Hazard Reporting

Unrecognized or uncorrected safety and health hazards should be reported immediately to supervisors. The *Hazard Reporting Form* (see Appendix 2) may also be utilized and sent to EH&S – anonymously if desired.

SAFETY AND HEALTH TRAINING

REQUIREMENT

Standard

The Program shall...(7) Provide training and instructions;

- (A) When the program is first established;*
- (B) To all new employees;*
- (C) To all employees given new job assignments for which training has not previously been received;*
- (D) Whenever new substances, 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; and,*
- (F) For supervisors to familiarize them with the safety and health hazards to which employees under their immediate direction and control may be exposed.(8 CCR Section 3203(a)(7)).*

IMPLEMENTATION

Safety and health training is required for all employees by University Policy in addition to the above standard. Each supervisor is responsible for training employees under their supervision, as well as new employees, in safe work procedures for their specific tasks. The supervisor is the key figure in the success of the Injury and Illness Prevention Program. They are responsible for being familiar with safety and health hazards to which their employees may be exposed, being able to recognize these hazards, the potential effects they have on the employees, and the rules, procedures and work practices for controlling exposure to those hazards. They must convey this information to employees by setting good examples, instructing them, and making sure they fully understand and follow safe procedures.

DOCUMENTATION

Written documentation of safety training is required per the OSHA IIPP. In order to assist the supervisor, three generic Employee Training Forms are referenced in Appendix 2 for office, laboratory and shops/trades employees. Use these forms or similar forms to document training of all employees. Training documentation must include the name of the person trained or other identifier, training dates, type(s) of training, and training providers. This documentation must be maintained for three (3) years by the supervisor. Departments may choose to also maintain centralized training records.

Copies of training records from training sessions conducted by Environmental Health & Safety are maintained on an EH&S database which can be searched by employee name, supervisor department: Go to the EH&S Web site then click on "Training Schedules" then "Department Training History". The online records go back to 7/2000.

RECORD KEEPING AND DOCUMENTATION

REQUIREMENT

Standard

(b) Records of the steps taken to implement and maintain the Program shall include:

- (1) Records of scheduled and periodic inspections required by subsection (a)(4) to identify unsafe conditions and work practices, including person(s) conducting the inspection, the unsafe conditions and work practices that have been identified and action taken to correct the identified unsafe conditions and work practices. These records shall be maintained for three (3) years; and*
- (2) Documentation of safety and health training required by subsection (a)(7) for each employee, including employee name or other identifier, training dates, type(s) of training, and training providers. This documentation shall be maintained for three (3) years.(8 CCR Section (b)).*

IMPLEMENTATION

Record keeping as a means of demonstrating compliance is essential. All documentation regarding **training and inspections** must be filed and maintained by the supervisor for three years minimum. Departments may also choose to maintain centralized copies of these records.

APPENDIX 1:

**INJURY AND ILLNESS PREVENTION PROGRAM:
DEPARTMENTAL INFORMATION**

(Department Safety Representative: Complete and post a copy on Department Safety Bulletin Board and maintain copy in *UCSB Health and Safety Binder* for viewing by Cal-OSHA)

DEPARTMENT NAME: _____

BUILDING(S) NAME: _____

DEPARTMENT HEAD or CHAIRPERSON:

_____ PHONE: _____

This person has the authority and responsibility to implement the Injury and Illness Prevention Program. This person is also responsible for designating a career employee and an alternate to assist the department in mandated health and safety program implementation as the Department Safety Representative.

MANAGEMENT SERVICES OFFICER (BUSINESS OFFICER):

_____ PHONE: _____

DEPARTMENT SAFETY REPRESENTATIVE:

_____ PHONE: _____

DEPARTMENT ALTERNATE SAFETY REPRESENTATIVE:

_____ PHONE: _____

Should there be a change in any of the positions above, please submit this form with corrections to the IIPP Manager at EH&S.

APPENDIX 2**FORMS: Injury and Illness Prevention Program**

The current forms associated with the *UCSB Injury and Illness Prevention Program* are all available on the EH&S and Business Services Web sites. In the interests of streamlining this binder and in having only the latest versions of the forms available, the form titles are noted here with Web links or references to them.

IIPP	FORM
FORM	TITLE*

A	Employee Safety Training Checklist: Offices
B	[deleted]
C	Developing Your Worksite Safety Training Program: Guidelines for Supervisors of Workers Performing Physical Labor (e.g. PF, Housing, shops)
D	Self-Inspection Checklist: Offices
E	[deleted]
F	Developing Your Worksite-specific Safety Inspection Checklist: Guidelines for Supervisors of Workers Performing Physical Labor (e.g., PF, Housing, shops)
G	Hazard Reporting Form
	Workers' Compensation Program forms and procedures