



Injury and Illness Prevention Plan (IIPP)

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Purpose

Per the California Code of Regulations, Title 8, Section 3203, University of San Diego ~~(University)~~ has adopted an Injury and Illness Prevention Program, which describes specific requirements for program responsibility, compliance, communications, hazard assessment, accident/exposure investigations, hazard correction, training, and recordkeeping. The University complies with Title 8 of the California Code of Regulations, Section 3203 by striving to maintain a safe and healthful working environment, and has implemented this Injury and Illness Prevention Plan (IIPP) for this purpose.

The University:

- Provides procedures for identifying and evaluating hazards and unsafe conditions;
- Develops procedures for correcting hazards and unsafe conditions;
- Communicates with employees regarding health and safety matters and how to report hazards;
- Provides employee training programs;
- Develops compliance strategies;
- Maintains documentation for health and safety programs; and
- Identifies a person or persons with authority and responsibility for implementing the program.

Responsibilities

Program Administrator

The individual with responsibility for implementing the IIPP is the Manager of Environmental Health & Safety (EH&S), Leilei Thein, hereafter referred to as the Program Administrator. The Program Administrator has the authority to implement all provisions of this IIPP for the University.

Responsibilities include:

- Advising senior management on safety and health issues.
- Working with senior management to develop safety and health guidelines and policies.
- Preparing and distributing the University's guidelines, policies and procedures on safety and health issues.
- Maintaining current information on local, state and federal safety and health regulations.

- Serving as liaison with governmental agencies.
- Planning, organizing and coordinating safety training.
- Developing a code of safe practices and inspection guidelines.
- Arranging for safety and health inspections and follow up to insure necessary corrective action is completed.
- Establishing, conducting and maintaining an injury/illness/accident report and investigation procedure.
- Coordinating with the University's Department of Risk Management on maintaining injury and illness records (OSHA log 300).
- Reviewing injury and illness trends.
- Establishing a system for maintaining the records of inspection, hazard abatement, and training.

Managers

Managers are responsible for ensuring that:

- Individuals under their management have the authority to implement appropriate health and safety policies, practices, and programs.
- Areas under their management have adequate funding for health and safety programs, practices, and equipment.
- Areas under their management are in compliance with University health and safety practices, policies, and programs.

Supervisors

Supervisors are responsible for implementing the University IIPP. This includes:

- Ensuring that workplaces and equipment are safe, well maintained, and in compliance with external agency regulations and University's policies, programs, and practices.
- Ensuring that workplace safety and health practices and procedures are clearly communicated and understood by employees through training programs.
- Enforcing health and safety rules fairly and uniformly relating to job performance.
- Evaluating employees on compliance with safe work practices.
- Acknowledging employees who make a significant contribution to maintenance of a safe workplace and disciplining employees who fail to follow safe work practices.
- Encouraging employees to report workplace hazards without fear of reprisals.
- Ensuring that periodic, scheduled workplace inspections are conducted and that identified health and safety deficiencies are corrected in a timely fashion.
- Ensuring that workplace incidents (injuries, exposures, or illnesses) are reported, investigated, and that corrective actions are taken promptly. See Accident/Exposure

Investigations section regarding procedures for reporting serious and non-serious incidents.

- Ensuring that inspections/investigations and employee health and safety records are kept for the designated period(s) of time.

Employees

Employees are responsible for following the requirements of the IIPP. This involves:

- Keeping themselves informed of conditions affecting their health and safety.
- Participating in training programs as required.
- Adhering to all healthy and safe practices in their workplace.
- Promptly reporting to their supervisors of potential hazards in the workplace and workplace incidents (injuries, exposures, or illnesses).

Department of Environmental Health and Safety (EH&S)

EH&S is responsible for the development and administration of the IIPP. This involves:

- Providing training and technical assistance to managers and supervisors on implementation of the IIPP.
- Assisting supervisors in conducting workplace hazard assessments to identify, evaluate, and correct hazards.
- Reviewing, updating and evaluating the overall effectiveness of the IIPP.
- Evaluating the adequacy and consistency of training designed by schools, departments, etc.

Compliance

All workers, including managers and supervisors, are responsible for complying with all safe and healthful work practices. Managers and supervisors are responsible for establishing and maintaining good health and safety practices. To ensure compliance:

- All workers are informed of the provisions of our IIPP
- Employees are recognized for following safe and healthful work practices (e.g., oral acknowledgments at receptions, small gifts such as plaques, etc.).
- Employees are trained and retrained, as necessary or as required.
- Health and safety practices are integrated into new employee job descriptions and performance appraisals.
- Disciplinary actions with employees for failure to follow safe and healthful work practices are taken, when appropriate.

- An anti-reprisal policy for employees reporting safety and health concerns is enforced.

Communication

All managers and supervisors are responsible for communicating with all workers about occupational safety and health issues in a form readily understandable by all workers. All department personnel are encouraged to communicate safety concerns to their managers and supervisor without fear of reprisal.

The various communication systems the University uses to relay information to all employees on matters relating to occupational safety and health, include:

- The training program;
- Health and safety publications;
- Health and safety meetings;
- Anonymous and confidential hazard reporting; and
- An anti-reprisal policy.

Training

A training program is an integral component of the communication system. The training program is described in the Training and Instruction section.

Health and Safety Publications

- Health and safety publications are disseminated by supervisors and Environmental Health and Safety.
- EH&S's website:

http://www.sandiego.edu/facilities/facilities_services/environmental_and_health_safety/

Health and Safety Meetings

Health and Safety meetings at the school, department or unit level are conducted to reinforce important concepts including, but not limited to the following:

- Clearly communicate health and safety programs and procedures to the employees and students.
- Encourage employees and students to report workplace hazards to management without fear of reprisal as described in Anti-Reprisal Policy.
- Encourage employees and students to report workplace incidents (injuries, exposures, and illnesses).

- Discussion of any problems, causes of accidents, near misses, hazards or potential hazards.

Anonymous Hazard Reporting

- To report a hazard or share a health and safety concern, employees may call the Office of Environmental Health and Safety, Extension 2595/2226 or through intra-campus mail or submit a concern to theinl@sandiego.edu.
- Hazard reporting may be done anonymously or confidentially.

Anti-Reprisal Policy

Employees and students shall not be discharged or discriminated against in any manner for bona fide reporting of health and safety hazards to the University or to appropriate governmental agencies. Supervisors shall inform employees and students of this policy and encourage reporting of workplace hazards to the management.

Hazard Assessment

Regular, annual workplace safety inspections of all departmental administrative, warehouse, hazardous waste storage, shops, and laboratories must be conducted by the inspection team, which consists of the Office of EH&S, building safety representative, and the manager(s) of the area involved.

Periodic inspections are performed according to the following schedule:

- When the IIPP was initially established;
- When new substances, processes, procedures or equipment which present potential new hazards are introduced into the workplace;
- When new, previously unidentified hazards are recognized;
- When occupational injuries and/or illnesses occur; and
- Whenever workplace conditions warrant inspection.

The inspections should be noted on the corresponding Checklists provided in Appendix B or other documentation, and the department should maintain copies of this documentation. Corrective Actions should be documented on the Hazard Correction Report (IIPP Form IV).

Generally, supervisors are responsible for identification and correction of hazards that their staff and/or students face and should ensure that work areas they exercise control over are inspected at least annually. Supervisors should check for safe work practices with each visit to the workplace and should provide immediate verbal feedback where hazards are observed.

Accident/Exposure Investigations

Injury Reporting

Employees who are injured at work must report the injury immediately to their supervisor. If immediate medical treatment beyond first aid is needed, call x2222. The injured party will be taken to the appropriate hospital or medical center.

The supervisor of the injured employee must work with Public Safety department personnel to ensure that the University Accident Report are completed properly and submitted to Workers' Compensation within 24 hours. Any work related injury or illness which requires inpatient hospitalization for a period in excess of 24 hours for other than medical observation or in which an employee suffers a loss of any member of the body or suffers any serious degree of permanent disfigurement shall be reported to Risk Management immediately.

If the injured employee saw a physician, the supervisor should obtain a medical release form before allowing the employee to return to work. The health care provider may stipulate work tasks that must be avoided or work conditions that must be altered before the employee resumes his or her full duties.

Injury Investigation

The employee's supervisor is responsible for performing an investigation to determine and correct the cause(s) of the incident. Specific procedures that can be used to investigate workplace accidents and hazardous substance exposures include:

- Interviewing injured personnel and witnesses.
- Examining the workplace for contributing factors.
- Determining all contributing causes to the accident.
- Reviewing established procedures to ensuring they are adequate and were followed.
- Taking corrective actions to prevent the accident/exposure from reoccurring.
- Recording all findings and actions taken.

The supervisor's findings and corrective actions should be documented. If the supervisor is unable to determine the cause(s) and appropriate corrective actions call EH&S or Risk Management.

Hazard Correction

The University is committed to correcting unsafe or unhealthy work conditions, practices, and procedures in a timely manner, based on the severity of the hazards. Hazards shall be corrected according the following procedures:

- When observed or discovered; and
- When an imminent hazard exists which cannot be immediately abated without endangering employee(s) and/or property, all exposed personnel will be removed from the area, except those necessary to correct the existing condition. Employees necessary to correct the hazardous condition shall be provided with necessary safeguards.

As corrective actions are implemented, supervisors shall document the effort and maintain such record for at least one year. Hazards discovered either as a result of a scheduled periodic inspection or during normal operations must be corrected by the supervisor in control of the work area as quickly as possible after discovery of a hazard.

Training and Instruction

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

- When the IIPP is first established;
- When new employees are hired, except for construction works who are provided training through a construction industry occupational safety and health training programs approved by Cal/OSHA;
- When employees are given new job assignments for which training has not previously been received;
- Whenever new substances, processes, procedures or equipment are introduced to the workplace and represent a new hazard;
- Whenever the employer is made aware of a new or previously unrecognized hazard;
- When employees become supervisors (so that they can familiarize themselves with the safety and health hazards to which employees under their immediate direction and control may be exposed).
- To all workers with respect to hazards specific to each employee's job assignment.

General workplace safety and health practices include, but are not limited to, the following:

1. Implementation and maintenance of the IIPP.
2. Emergency action and fire prevention plan.
3. Provisions for medical services and first aid including emergency procedures.
4. Prevention of musculoskeletal disorders, including proper lifting techniques.
5. Proper housekeeping, such as keeping stairways and aisles clear, work areas neat and orderly, and promptly cleaning up spills.
6. Prohibiting horseplay, scuffling, or other acts that tend to adversely influence society.

7. Proper storage to prevent stacking goods in an unstable manner and storing goods against doors, exits, fire extinguishing equipment and electrical panels.
8. Proper reporting of hazards and accidents to supervisors.
9. Hazard communication, including worker awareness of potential chemical hazards and proper labeling of containers.
10. Proper storage and handling of toxic and hazardous substances including prohibiting eating or storing food and beverages in areas where they can become contaminated.

Recordkeeping

Documents related to the IIPP are maintained in a safe and convenient location for record keeping. Documents that should be kept on file include:

- Records of hazard assessment inspections, including the person(s) conducting the inspection, the unsafe conditions and work practices that have been identified, and corrective actions taken, are recorded on a hazard assessment and correction form; and
- Documentation of safety and health training for each employee, including the employee's name or other identifier, training date, type(s) of training, and training providers, are recorded on a worker training and instruction form.
- Reports of Unsafe Conditions or Hazards.
- Safety Committee Meeting Documentation.
- Hazard Correction Reports.
- Accident, Injury or Illness Investigation Reports

Inspection reports and training documentation will be maintained for one year.