



Injury and Illness Prevention Plan (IIPP)

August 31, 2018

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Purpose

University of San Diego has adopted an Injury and Illness Prevention Program, which describes the specific requirements for program responsibility, compliance, communications, safety inspections, incident investigations, hazard correction, training, and recordkeeping. The University complies with Title 8 of the California Code of Regulations, Section 3203, by implementing this Injury and Illness Prevention Plan (IIPP) to maintain a safe and healthy environment for employees and students.

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

The ultimate responsibility for providing resources towards the goal of effective policies regarding environmental health and safety issues rests with the President of the University. General policies, which govern the activities and responsibilities of the Injury and Illness Prevention Program, are established under the authority of the President.

Program Administrator

The Program Administrator, the individual with responsibility for implementing the IIPP, is the Director of Environmental Health & Safety (EH&S). 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 and distribute the University's health and safety guidelines, policies and procedures.
- 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 safety inspection guidelines.
- Establishing and maintaining an incident report and incident 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.

Managers

Managers are responsible for ensuring that:

- Individuals under their management have the authority and funding to implement appropriate health and safety practices, policies, and programs.
- Areas under their management comply 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 policies, programs, and practices.
- Ensuring that safety and health practices and procedures are clearly communicated and understood by employees through training programs.
- Scheduling and facilitating monthly safety trainings and delivering records to EH&S.
- Enforcing health and safety rules fairly and uniformly relating to job performance.
- Acknowledging employees who contribute to maintaining a safe workplace and disciplining employees who fail to follow safe work practices.
- Encouraging employees to report workplace hazards and injuries without fear of reprisals.
- Ensuring that workplace injuries, exposures, or illnesses are reported and investigated.
- Ensuring that corrective actions are completed after Building Safety Inspections and Incident Investigations.
- Ensuring that employee health and safety records are kept for the designated period 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.
- Adhering to all health and safety policies and procedures in their workplace.

- Participating in training programs as required.
- Promptly notifying their supervisors of potential hazards 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.
- Providing training and assistance to Building Safety Representatives on performing Workplace Safety Inspections to identify, evaluate, and correct hazards.
- Evaluating the adequacy and consistency of training designed by schools, departments, etc.
- Maintaining records of building safety inspections, incident investigations, corrective actions, and training.
- Reviewing, updating and evaluating the overall effectiveness of the IIPP.

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 in their first month of work.
- Employees are trained and retrained, as necessary or as required.
- Health and safety practices are integrated into new employee job descriptions and performance appraisals.
- EH&S collaborates with supervisors to update and improve health and safety enforcement strategies specific to each department.
- Employees are recognized for following safe and healthful work practices.
- Disciplinary actions are taken with employees for failure to follow established safe and healthful work practices.
- An anti-reprisal policy for employees reporting safety and health concerns is enforced.

Communication

Environmental Health & Safety serves as the primary communication liaison for distribution of health and safety information to managers, supervisors, employees, and students. 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 employees 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:

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

Supervisors and the Department of Environmental Health and Safety disseminate health and safety publications to campus employees and students.

Building Safety Representative Meetings

EH&S coordinates semiannual building safety representative meetings to discuss:

- Building safety roles and responsibilities.
- Common workplace hazards;
- Fire safety and emergency preparedness;
- Building Safety Inspections and Hazard Correction procedures;

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 2226 or email ehs@sandiego.edu. Hazard reporting may be done anonymously or confidentially.

Anti-Reprisal Policy

Supervisors shall inform employees and students of the University's Anti-Reprisal Policy and encourage reporting of workplace hazards and incidents to EH&S or management. Employees and students shall not be disciplined or discriminated against in any manner for bona fide reporting of health and safety hazards and workplace incidents to the University or to appropriate governmental agencies.

Safety Inspections

Workplace hazard inspections of all departmental administrative, warehouse, hazardous waste storage, shops, and laboratories are performed semiannually by either the Building Safety Representative or the Department of EH&S. All building inspections are documented on a Building Safety Inspection Checklist. All Corrective Actions must be recorded in the Comment section of the Safety Inspection Form, or on a Hazard Correction Report found in Appendix A. EH&S will maintain copies of these records for one year.

Periodic inspections are performed semiannually and when the following occurs:

- When the IIPP is initially established;
- When new substances, procedures or equipment present potential new hazards;
- When previously unidentified hazards are recognized; and
- When occupational injuries and/or illnesses occur.

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. Supervisors should contact EH&S if assistance is required to correct any safety or health hazards.

Incident Investigations

Incident Reporting

Employees who are involved in an accident at work must report the potential injury or exposure immediately to their supervisor. Students who are involved in an accident should report the incident to their instructor. In the case of all serious and non-serious incidents, USD Public Safety must be called, so an officer can report to the scene, assess the need for additional aid, and fill out an Incident Report. If immediate medical treatment beyond first aid is needed, Public Safety Dispatch will call the appropriate emergency response personnel and the injured party will be taken to the appropriate hospital or medical center. **If the incident involves any contact with an employee's head or neck, Public Safety must be called immediately and a medical exam is required.**

Any work-related injury or illness in which an employee suffers any serious degree of disfigurement or requires inpatient hospitalization shall be reported to EHS immediately. If the injured employee saw a physician, the supervisor must obtain a medical release form before the employee returns 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.

Incident Investigation

The supervisor of the injured employee must work with designated department personnel to complete a University Incident Report (obtained from Public Safety) and submit it to Risk Management and EH&S within 24 hours of the occurrence. 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 should be documented on the Incident Investigation Report in Appendix A. If the supervisor is unable to determine the cause(s) and appropriate corrective actions, Environmental Health & Safety should assist with the Incident Investigation. Corrective actions performed shall be recorded on the Hazard Correction Report in Appendix A.

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.

Hazards may be reported during a Building Safety Inspection or submitted to EH&S through a Report of Unsafe Condition found in Appendix A. EH&S shall document completed corrective actions and maintain such records for at least one year. Hazards must be corrected by the supervisor in control of the work area, with cooperation from the supervisor of the employees working in that area. Supervisors of affected employees are expected to correct unsafe conditions 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;
- To all workers regarding hazards specific to each employee's job assignment.
- When new employees are hired, except for construction workers who are provided training through a construction industry occupational safety and health training programs approved by Cal/OSHA;
- When employees are introduced to new substances, processes, procedures or equipment that present a new hazard to them;
- Whenever the employer is made aware of a previously unrecognized hazard;
- When employees become supervisors (so that they can familiarize themselves with the safety and health hazards to which employees may be exposed).

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.

EH&S and Public Safety administer New Employee Orientation to every person beginning employment at University of San Diego. Orientation training covers the written Injury and Illness Prevention Plan, office safety, fire safety,

Supervisors coordinate and administer monthly safety trainings in which workers view relevant safety videos in their primary spoken language. Supervisors must be available to answer all questions and distribute quizzes to ensure clarity and retention of concepts. Supervisors must

give quizzes and a complete Group Safety Training Sign-In Sheet to the Office of Environmental Health and Safety.

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:

- Reports of Unsafe Conditions or Hazards.
- Building Safety Inspections.
- Hazard Correction Reports.
- Accident, Injury or Illness Investigation Reports.
- Safety Committee Meeting Documentation.

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



Appendices – IIPP Documents

- A. Report of Unsafe Condition
- B. Building Safety Inspection Checklist
- C. Incident Investigation Report
- D. Hazard Correction Report
- E. Group Training Documentation
- F. Safety Committee Documentation

REPORT OF UNSAFE CONDITION OR HAZARD

Department: _____

I. Unsafe Condition or Hazard

Name: (optional) _____ Job: _____

Title: _____

Location of Hazard: _____

Building: _____ Floor: _____ Room: _____

Date and time the condition or hazard was observed:

Description of unsafe condition or hazard: _____

What changes would you recommend to correct the condition or hazard?

Employee Signature: (optional) _____

Date: _____

II. Management/EH&S Investigation

Name of person investigating unsafe condition or hazard:

Results of investigation (What was found? Was condition unsafe or a hazard?): (Attach additional sheets if necessary.)

Proposed action to be taken to correct hazard or unsafe condition: (Complete and attach a Hazard Correction Report, IIPP Form 4)

Signature of Investigating Party: _____

Date: _____

Completed copies of this form should be routed to the appropriate supervisor and the Department of Environmental Health & Safety, and must be maintained in department files for at least one year.

BUILDING SAFETY INSPECTION CHECKLIST

A. Extinguishers

Yes No N/A

1. Are your fire extinguishers visible and have no obstructions?			
2. Are the fire extinguishers accessible and not blocked?			

B. Evacuations

Yes No N/A

1. Are corridors/hallways clear of all obstructions?			
2. Are stairwells clear of all obstructions?			
3. Are the electrically illuminated exit signs working?			
4. Are exit stairwell doors and fire doors being kept closed? (no door stops)			
5. Are pull stations visible and accessible?			
6. Combustible materials are cleared from heat sources such as water furnaces, floor heaters, or space heaters?			
7. There are no flammable/combustible materials being stored under stairwells or staircases?			
8. Are exits clear and not blocked, locked or have improper lighting?			

C. Electrical

Yes No N/A

1. There are no extension cords being used in lieu of permanent wiring?			
2. Are extension cords in good condition and UL-Listed?			
3. Are extension cords not tacked or stapled to the wall or woodwork?			
4. There are no trip hazards created by extension cords?			
5. Are electrical outlets not being overloaded?			
6. Are space heaters being used with tip over switch? (auto turn off when tipped over)			
7. Are portable electric space heaters plugged directly into a permanent receptacle?			
8. Are space heaters being used 3 feet away from any combustible materials?			

D. Housekeeping and Storage

Yes No N/A

1. Are work areas kept in clean and orderly conditions?			
2. Is there a minimum of 18" between stored materials and sprinkler heads?			
3. Is there a minimum 24" of clearance below ceiling without sprinklers?			
4. Is artwork and teaching material limited on the walls of corridors to not more than 50% of wall area?			

INCIDENT INVESTIGATION REPORT

EMPLOYEE INFORMATION						
Last Name		First Name		MI		USD ID#
Address				City/State/Zip		
Department		Hire Date		Supervisor's Name		
Home Phone		Work Phone		Supervisor's Phone		
EMPLOYEE STATEMENT						
Type of Incident		Location of Incident		Date & Time		
Medical Treatment Required or Requested? YES <input type="checkbox"/> NO <input type="checkbox"/>			If so, Diagnosis?			
Injury Classification: Lost Time <input type="checkbox"/> First Aid Only <input type="checkbox"/> Medical Only <input type="checkbox"/> Incident Only <input type="checkbox"/>						
Was the employee made aware of hazards and proper Safe Work Practices associated with the task before the incident? YES <input type="checkbox"/> NO <input type="checkbox"/>						
Describe in detail how the injury occurred. Include specific activities, equipment, materials, and people involved.						
What workplace condition, work practice, or lack of protective equipment contributed to the incident?						
Employee Signature				Date		
WITNESS STATEMENT						
Witness Name		Statement Obtained?	YES <input type="checkbox"/> NO <input type="checkbox"/>	Date		
Witness Name		Statement Obtained?	YES <input type="checkbox"/> NO <input type="checkbox"/>	Date		
Did the witness know the proper Safe Work Practices to prevent injury? YES <input type="checkbox"/> NO <input type="checkbox"/>			Is this policy enforced? YES <input type="checkbox"/> NO <input type="checkbox"/>			
How were they trained?	Safety Topic		Instructor		Date	
Have they observed injured employee performing this task prior to the injury? YES <input type="checkbox"/> NO <input type="checkbox"/>						
Was it being performed correctly at the time? YES <input type="checkbox"/> NO <input type="checkbox"/>			Was the supervisor aware of this information? YES <input type="checkbox"/> NO <input type="checkbox"/>			
INVESTIGATOR STATEMENT						
What was the injury, illness, or exposure?				Was a mandatory Safe Work Practice violated? YES <input type="checkbox"/> NO <input type="checkbox"/>		
What physical, mechanical, or environmental conditions contributed to this accident?						

EMPLOYEE TRAINING AND RECORDS REVIEW						
How was the employee instructed to perform the job correctly?						
Training/Orientation <input type="checkbox"/>		Safe Work Practices <input type="checkbox"/>		Manuals <input type="checkbox"/>		
Verbally <input type="checkbox"/>		Post-Accident <input type="checkbox"/>				
Safety Topic		Instructor		Date		
Safety Topic		Instructor		Date		
EQUIPMENT RECORDS REVIEW						
Equipment Name		Serial				
Last Inspection/ Maintenance Performed		By		Date		
INITIAL CAUSE	CONTRIBUTING FACTORS AND ACTIVITIES					
<input type="checkbox"/> Struck by or against object: <hr/> <input type="checkbox"/> Caught in/ under/between <input type="checkbox"/> Fall/Slip/Trip <input type="checkbox"/> Material handling or lifting <input type="checkbox"/> Repetitive motion <input type="checkbox"/> Chemical Exposure <input type="checkbox"/> Bodily Fluid exposure <input type="checkbox"/> Needle Stick <input type="checkbox"/> Sharps <input type="checkbox"/> Other	Equipment <input type="checkbox"/> Equipment failure <input type="checkbox"/> Equipment unavailable <input type="checkbox"/> Improper equipment or material used: <hr/> Personal Protective Equipment <input type="checkbox"/> Not worn <input type="checkbox"/> Not readily available <input type="checkbox"/> Not adequate for the task <input type="checkbox"/> Personal Protective Equipment failure	Training/Experience <input type="checkbox"/> Lack of training <input type="checkbox"/> Safety training not followed <input type="checkbox"/> Lack of policy/procedure <input type="checkbox"/> Lack of experience for task Work Area <input type="checkbox"/> Work area set up improperly <input type="checkbox"/> Inadequate light or noise <input type="checkbox"/> Housekeeping issues <input type="checkbox"/> Environmental Factors (rain, wind, temp, etc) <input type="checkbox"/> Ventilation issues <input type="checkbox"/> Ergonomic factors	Employee <input type="checkbox"/> Physically unable to do work <input type="checkbox"/> Employee fatigue <input type="checkbox"/> Unbalanced or poor position or motion <input type="checkbox"/> Incorrect procedures used <input type="checkbox"/> Other unsafe practice Assistance <input type="checkbox"/> Difficult to perform task without help <input type="checkbox"/> Safety features or devices not readily available <input type="checkbox"/> Assistive devices not used			
<input type="checkbox"/> Other, explain: <hr/> <hr/>	<input type="checkbox"/> Other, explain: <hr/> <hr/>					
PREVENTATIVE ACTIONS						
Has this incident identified any areas in need of additional focus? YES <input type="checkbox"/> NO <input type="checkbox"/>						
Area				Focus		
SUPERVISOR WILL: <input type="checkbox"/> Develop/revise safety procedures and update IIPP or CHP <input type="checkbox"/> Request Ergonomic evaluation <input type="checkbox"/> Order new equipment: _____ <input type="checkbox"/> Remove equipment from use to repair/replace <input type="checkbox"/> Schedule preventative maintenance <input type="checkbox"/> Perform on-site review of work activity, update Job Safety Analysis <input type="checkbox"/> Schedule additional training: _____ <input type="checkbox"/> Reconfigure work area <input checked="" type="checkbox"/> Communicate corrective actions to others in job category <input type="checkbox"/> Other: _____				PREVENTATIVE ACTIONS WILL BE COMPLETED BY: <hr/> EXPECTED DATE OF COMPLETION: <hr/> NOTES: <hr/> <hr/>		
INCIDENT INVESTIGATION COMPLETED BY:						
Employee's Supervisor					Date	
INCIDENT INVESTIGATION APPROVED AND REVIEWED BY:						
Department Head's Signature					Date	

HAZARD CORRECTION REPORT

Department: _____

This form should be used in conjunction with the “Report of Unsafe Condition” form (IIPP Form I), as appropriate, to track the correction of identified hazards.

All hazards should be corrected as soon as possible, based on the severity of the hazard. If a serious imminent hazard cannot be immediately corrected, remove personnel from the area and restrict access until the hazard can be addressed.

Supervisor/Safety Coordinator Name

Phone Number

Supervisor/Safety Coordinator Signature

Date

Description and Location of Unsafe Condition	Date Discovered	Required Action and Responsible Party	Completion Date	
			Projected	Actual

Completed copies of this form should be routed to the Department of Environmental Health & Safety and kept in Department files for at least one year.

