

INJURY & ILLNESS PREVENTION PROGRAM
FOR
SAN JOSÉ - EVERGREEN COMMUNITY COLLEGE DISTRICT

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INTRODUCTION

In order to maintain a safe and healthful work environment San José-Evergreen Community College District has developed this Injury & Illness Prevention Program (IIPP) for all employees to follow. This document describes the goals, statutory authority, and the responsibilities of all employees under the Program, as well as the District's responsibility as an employer to provide a safe and healthful work environment. The program includes, but is not limited to, the following: Hazard Identification and Correction, Steps taken to assure Employee Compliance, Injury Incident and Near Miss Investigations, Employee Safety Training, Safety Communication, and Program Documentation. By making employee workplace safety a high priority for every administrator, supervisor and employee, the District will work together to reduce injuries and illnesses, increase productivity, and promote a safe and healthy environment for all individuals at San José-Evergreen Community College District.

GOALS

Implementation of this program will accomplish several notable goals for San José-Evergreen Community College District. Most notably it will:

1. Protect the health and safety of employees and decrease the potential risk of disease, illness, injury, and harmful exposures to District personnel.
2. Reduce workers' compensation claims and costs.
3. Improve efficiency by reducing the time spent replacing with substitutes or reassigning injured employees to temporary modified duty, as well as reduce the need to find and train replacement employees for those employees who may no longer be able to return to work.
4. Improve employee morale and efficiency as employees see that their safety is important to management.
5. Minimize the potential for penalties assessed by various enforcement agencies by maintaining compliance with Health and Safety Codes and Cal/OSHA standards.
6. San José-Evergreen Community College District recognizes that as an employer it bears the responsibility for maintaining a safe and healthful work environment for all of its employees. The District takes this responsibility seriously and will do all it can to meet this requirement.

STATUTORY AUTHORITY

- ◆ California Labor Code Section 6401.7.
- ◆ California Code of Regulations Title 8, Sections 1509 and 3203.

This manual is intended to provide each department at San José-Evergreen Community College District with the information and guidance necessary to comply with the regulations. Following is a brief summary of the required activities to comply with these laws.

- A Program Coordinator will be responsible for the implementation and maintenance of this program. Any questions can be directed to the Program Coordinator's attention.
- San José-Evergreen Community College District has developed through its negotiated collective bargaining process, disciplinary procedures and processes with regard to employee compliance with safety rules and safe work practices. It will be the responsibility of managers and supervisors to ensure that the safety rules and work practices are implemented in a fair and non-discriminating manner, as well as offering positive reinforcement and recognition for employees who do an exemplary job of promoting a safe work environment by both example and who communicate to peers on safety issues.
- Managers and supervisors are required to ensure that safety and health information is communicated to the employees within their supervision. There are suggested methods to follow in the manual; however, methods may be expanded as special circumstances related to their area dictate.
- Injury and illness hazards in the workplace must be identified. A formal self-inspection program and an equipment evaluation system have been developed to meet this requirement.
- The immediate supervisor of the employee must investigate each work-related injury or illness. Forms and procedures for this investigation are included in the Appendices of this manual.
- Deficiencies or hazards identified during a self-inspection or in an Injury Incident/Near Miss investigation must be corrected. Supervisors/managers must ensure that employees adhere to the correction. The priority of the correction of the hazardous condition should be commensurate with the hazard. **Documentation is required.** Copies of documentation must be kept in each department as well with the coordinator.
- All employees should receive appropriate training in identifying and guarding against injury and illness hazards associated with their work. Documentation is required detailing the date of the training, the topic, presenters, and the signatures of those employees in attendance. Copies of training documentation must be kept in each department as well as with the Program Coordinator or designee.

Cooperation and support are important elements in making this a successful program. Your positive, cooperative attitude is appreciated.

PROGRAM MANAGEMENT

RESPONSIBILITY

STANDARD:

The person with the authority and responsibility to implement and manage the Injury & Illness Prevention Program (IIPP) is identified as the Program Coordinator. All levels of the District administration have been informed and accept that the Program Coordinator has the authority to enforce the elements of this program, regardless of position of stature within the organization.

REQUIRED ACTIVITIES:

1. Jorge Escobar, Interim Vice Chancellor of Administrative Services is identified as the Injury and Illness Program Coordinator for the District and is responsible for administering the requirements of the Program per section 3203 of Title 8 of the California Code of Regulations Industrial Safety Orders.
2. The Program Coordinator or designee will maintain overall control of the required activities, which have to occur at various intervals throughout the year. All managers and supervisors will implement the required Program activities for their respective area of responsibilities.
3. Failure on the part of managers and supervisors to implement required Program activities will result in appropriate disciplinary action.
4. The Program Coordinator, designee, or the appropriate area Manager/Supervisor will be available to answer technical questions involving self-inspections, employee training, and other aspects of the administration of this IIPP.
5. Some aspects of the IIPP will have to be implemented as appropriate at the time an Injury Incident/Near Miss occurs. For example, if an employee violates a work rule, a verbal warning should be given at the time; or if a work related injury occurs, an Injury Incident/Near Miss Investigation Report should be completed immediately.
6. Department managers and supervisors must assure that all purchase requisitions for chemicals or products containing hazardous materials include a request for Safety Data Sheets (SDS). The Purchasing Department will request from vendors Safety Data Sheets for any and all chemicals as directed by specific departments. Department managers and supervisors must ensure that SDS are received and retained by the department.
7. The Purchasing Department will also request that all tools and equipment purchased for use by District employees meet the American National Standards Institute safety standards. The ANSI standards are the guidelines used by Cal OSHA as the benchmark for its enforcement group.

MOTIVATION AND DISCIPLINE

COMPLIANCE

STANDARD:

A system should be in place to ensure that employees comply with safe and healthy work practices. This may include the use of incentives, training or retraining, and disciplinary action.

REQUIRED ACTIVITIES:

1. To encourage safe behavior on the job, first line supervisors should acknowledge their employees for performing work safely. This provides positive affirmation and encourages cooperation with the program.
2. Department managers and supervisors are encouraged to recognize employees making an exceptional contribution to the Safety Program with a brief letter (with a copy to the employee's personnel file).
3. If a supervisor observes an employee performing in an unsafe manner, he/she should determine the reason. If disciplinary action is required, the procedure identified in item # 4 below should be used. If a lack of knowledge is involved, appropriate training should be provided.
4. When an employee is uncooperative and deliberately does not support the Program or does not follow safe work practices, disciplinary action in accordance with the collective bargaining agreement should be exercised.
5. All employees will receive copies of the District General Safe Work Practices and Job Specific Safe Work Practices, upon hire and when a new job assignment is undertaken.

COMMUNICATION

REQUIRED ACTIVITIES:

1. When conducting employee meetings for any purpose, subjects relating to on-the-job safety and health issues should be included as appropriate. Examples include:
 - An injury within the department could serve as an instructional topic.
 - An identified hazard and how to work with or around it to prevent injury.
 - An unsafe work behavior observed during normal work activities.
 - The directive for everyone to observe, identify, and report defects that could cause injury to themselves or to others.
2. If an employee is exposed to a new work activity that could cause problems either immediately or in the future, a hazard specific training program should be conducted. Training could either take place at the work site under the guidance of the supervisor or it could require an off-site program.
3. Employees can often benefit by information posted in the work area. This includes safety posters, instructional visual aids, warning signs, and other media directed at employee health and safety.
4. Other written communications on subjects which may be of importance can be provided to employees directly. (Example: earthquake preparedness, fire evacuation, how to handle bomb threats, and other appropriate subjects).
5. Consider having an employee “Suggestion Box” in the work area as a way to enhance two way communication and reinforce the safety program. The Safety Recommendation Form in Appendix G. to this IIPP is available on the Risk Management web page of the District Services’ website.
6. Records or minutes should be kept of all meetings, training programs, postings, and other required activities in which safety issues are discussed. Copies should be sent to the Program Coordinator or designee.

HAZARD IDENTIFICATION

REQUIRED ACTIVITIES:

1. A workplace Self-Inspection Checklist has been developed for general work areas and laboratory spaces within the San José-Evergreen Community College District.
2. At a minimum of semi-annual intervals, workplace safety inspections should occur at each work area. The inspection forms can be obtained from the Program Coordinator or designee. A knowledgeable, interested employee should be selected to perform the semi-annual self-inspection. Extra checklists should be kept in the Appendix section.
3. Prior to conducting the semi-annual safety inspection, the selected employee should review general and specific safe work practices for their department.
4. The safety inspection should be a continuous, uninterrupted activity designed for the sole purpose of identifying unsafe work conditions and practices. Whenever possible, immediate corrective action should be taken to remove hazards and correct unsafe work practices.
5. Once immediate corrective actions have been taken, a copy of the Self-Inspection Checklist should be forwarded to the Program Coordinator or designee for review and appropriate filing. The Program Coordinator may submit a work order request to the Maintenance Department to address specific corrective actions. A copy should also be provided to the department manager/supervisor for the purpose of documentation for follow-up on both completed and uncompleted items.
6. All conditions determined to be deficient should be corrected within a reasonable period of time. The corrections should be done in order of importance in relation to potential injury severity, most serious identified hazards first.
7. If for some valid reason a condition is not corrected or it is postponed to some future date, proper documentation of the reason for not taking corrective action or for postponement should be included in the record.
8. The Program Coordinator or designee will follow-up to ensure that all unsafe conditions and unsafe work practices have been corrected. Records should be retained for three years.
9. New equipment, tools, and materials to be used by District employees should first be evaluated for work related injury and illness hazards by the Department Manager or Supervisor. Identified hazards should be documented and addressed in a timely manner.

INJURY INCIDENT/NEAR MISS INVESTIGATIONS

REQUIRED ACTIVITIES:

1. All employees should know and understand that they are to report all work-related injuries, illnesses or near misses to their supervisor immediately at the time the injury, illness or near miss takes place. A near miss is defined as an activity or event in which an injury could have occurred, but did not (for example a tool falls from an elevated platform and narrowly misses an unprotected worker below). Please see Near Miss Reference Guide & Checklist in Appendix B.
2. As soon as possible following a work-related injury or illness (or after first aid treatment has been administered), the manager/supervisor should complete the Supervisor's Report of Employee Injury/Incident form and send it to the Benefits Coordinator within two (2) business days of the injury/incident. The manager/supervisor should conduct a comprehensive investigation of the injury/incident by using the Injury Incident Reference Guide & Checklist in Appendix B. The focus of the investigation should be to identify unsafe conditions or work practices that may have caused the injury or illness. A completed Supervisor's Injury/Incident Investigation Report form should be sent to the Benefits Coordinator in Human Resources within five (5) business days. Worker's Compensation forms (DWS-1 and Form 5020) should not be delayed pending completion of the above forms.
3. Whenever practical and necessary, corrective action should be identified. Corrective action can and should include training, retraining, physical alterations of the work place, and in some cases disciplinary action.
4. The Program Coordinator or designee will maintain a log for all Injury Incident Investigation Reports so that a follow-up can be made to ensure that corrective action was taken. The log shall include the date reported, the location of the incident, a brief description of the incident, any action taken and the date such action is taken, and whether the matter is resolved.
5. The Supervisor's Injury/Incident Investigation Report form and Supervisor's Injury/Incident Investigation Report form for San José-Evergreen Community College District can be found in Appendix A of this Injury & Illness Prevention Program. The Injury Incident Investigation Quick Reference Guide & Checklist and Near Miss Quick Reference Guide & Checklist can be found in Appendix B.

HAZARD CORRECTION

REQUIRED ACTIVITIES:

1. All employees, especially managers and supervisors, have the responsibility to observe, identify, and report unsafe conditions as part of their responsibilities.
2. Identifying and correcting unsafe work practices and conditions is a required activity within this program and must be taken seriously. No employee will be disciplined, retaliated against, or discriminated against for reporting an unsafe condition.

When an unsafe condition or equipment is reported, the supervisor or manager shall prepare a written statement of the condition and correct it immediately, if appropriate, or notify the proper Department for corrective action. Assuring correction or replacement of unsafe equipment and/or conditions is the responsibility of the department administrator to which the condition/equipment belongs. Records of the correction of the unsafe condition/equipment, such as work orders, shall be maintained by the Department. The department administrator is responsible for assuring that a semi-annual Safety Inspection Report is completed each semester using the appropriate Self-Inspection Checklist found in Appendix C.

3. The Injury/Incident Investigation Form shall be maintained by the Program Coordinator or designee for future reference. This documentation should include the corrective action to be taken or the decision not to take any action. Documentation should be retained for at least three years or as required by state and federal law.
4. 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 with the necessary safeguards.

TRAINING

REQUIRED ACTIVITIES:

1. The Safe Work Practices, which apply to job categories throughout the District, have been developed by managers and supervisors. Safe Work Practices are intended to be the core of the safety and health training at San José-Evergreen Community College District.
2. Each existing employee shall receive a copy of the Safe Work Practices that applies to his/her job upon hire and the adoption/update of the IIPP. The employee is required to read and understand the material and then sign the Orientation Checklist Form as indication of receipt of a copy of the IIPP and Safe Work Practices for the specific job.
3. It should be the responsibility of the immediate supervisor to provide each employee with a copy of the Safe Work Practices, at which time the supervisor should determine whether or not the employee has a complete understanding of the material. Questions and discussion of the Safe Work Practices are encouraged. Supervisors are required to be familiar with the job hazards of all employees for whom they are responsible.
4. Each new hire or existing employee assigned to a new department or job should receive a copy of the Safe Work Practices prior to beginning work. The procedure should be similar to that discussed above (item 3); it is a requirement of this program that no employee actually perform any on-the-job activity without receiving a copy of the Safe Work Practices, and having the opportunity for discussion and receiving proper safety training.
5. General workplace safety and health practices include, but are not limited to:
 - Implementation and maintenance of the IIPP Program.
 - Implementation and maintenance of the District's Emergency Operations Plan.
 - Provisions for medical services and first aid including emergency procedures.
 - Prevention of musculoskeletal disorders, including proper lifting techniques.
 - Proper housekeeping, (ex., keeping stairways and aisles clear, work areas neat and orderly, and spills promptly cleaned up.
 - Prohibiting horselplay, scuffling, or other acts that tend to adversely influence safety.
 - Proper storage to prevent stacking goods in an unstable manner and storing goods against doors, exits, fire extinguishing equipment and electrical panels.
 - Proper reporting of hazards and accidents to supervisors.
 - Hazard communication, including worker awareness of potential chemical hazards, and proper labeling of containers.
 - Proper food storage and handling of toxic and hazardous substances.

6. The following methods are available for providing safety and health training to our employees.

- Safe Work Practices – for all employees
- Safety Meetings
- Operator Certification Training for specific equipment
- Outside Seminars – In select situations
- Guest Speakers – Effective training for large groups
- Video recordings – Effective training medium available from varied sources in the area
- Safety Newsletters – Available through Keenan Safe Colleges

Record keeping is a very important aspect of the IIPP. Training is one of the subjects that require very accurate documentation and record keeping.

Each department is responsible to document training of its employees.

Training documentation must contain:

- Name of Employee
- Date of Training
- Topic Covered
- Source or Provider
- Training records should be retained for at least three years or as required by state and federal law

7. A sample training documentation form is included in Appendix to the IIPP.

DOCUMENTATION

Many standards and regulations of Cal/OSHA contain requirements for the maintenance and retention of records for occupational injuries and illnesses, medical surveillance, exposure monitoring, inspections, and other activities relevant to occupational health and safety. To comply with these regulations, as well as to demonstrate that the critical elements of this Injury & Illness Prevention Program are being implemented, the following records will be kept on file in the District Office or school site for at least the length of time indicated below:

1. Copies of all Self-Inspection Checklists should be retained for 1 year.
2. Copies of all Injury Incident/Near Miss Investigation Forms should be retained for 5 years.
3. Copies of individual Employee Training Checklists and related Training Documents should be retained for at least three years, or for the duration of each individual's employment, whichever is greater.
4. Copies of all Safety Meeting Attendance Sheets should be retained for 1 year.
5. The General Training Documentation forms for San Jose-Evergreen Community College District can be found in Appendix D of the Injury & Illness Prevention Program.

The District or College will ensure that these records are kept in their files, and present them to Cal/OSHA or other regulatory agency representatives if requested. A review of these records will be conducted by the Program Coordinator or designee during routine program reviews to measure compliance with the Program.

A safe and healthy workplace must be the goal of everyone at San Jose-Evergreen Community College District, with responsibility shared by management and staff alike. If you have any questions regarding this Injury & Illness Prevention Program, please contact the District Office Risk Manager at (408) 270-6440.

RECORDKEEPING

We are a local governmental entity (county, city, district, or and any public or quasi-public corporation or public agency) and we are not required to keep written records of the steps taken to implement and maintain our IIP Program. Public agencies including Community College Districts are not required to maintain OSHA 300 logs as long as an alternative method is available to review injury history, upon request. That resource is available through the NCCC Pool WC JPA.