

SECTION 2

Your Injury and Illness Prevention Program

SECTION 2: YOUR INJURY AND ILLNESS PREVENTION PROGRAM (IIPP)

Overview

The Injury and Illness Prevention Program (IIPP) is a documented safety plan to protect employees from injuries and illnesses in the workplace. It complies with the California Code of Regulations Title 8, Section 3203 by establishing a framework for identifying and correcting workplace hazards, ensuring employee training and compliance, and communicating information relating to employee safety and health issues. The information is reviewed and updated on a regular basis to reflect any changes in regulations, personnel, or procedures.

Responsibilities

Management

Management must ensure that an IIPP is implemented in all areas under their scope of responsibility, including shops. They must establish a process, such as a Safety Committee or Safety Coordinator, to maintain, update, and implement this safety program.

Supervisors

Supervisors play a key role in the implementation of the IIPP. They are responsible for the following:

1. Encouraging a safe work culture by modeling and enforcing safe work practices;
2. Completing periodic (quarterly as best practice, semi-annual at a minimum), inspections of shops under their direction;
3. Stopping work that poses an imminent hazard;
4. Implementing measures to eliminate or control workplace hazards;
5. Developing safe work procedures such as standard operating procedures (SOPs) and job safety analyses (JSAs);
6. Providing appropriate safety training and personal protective equipment to employees under their supervision;
7. Documenting employee training and departmental safety activities;
8. Reporting work related injuries and illnesses;
9. Encouraging employees to report health and safety issues without fear of reprisal;
10. Disciplining employees who do not comply with safe work practices; and
11. Communicating all health and safety issues.

Employees

All employees must comply with applicable health and safety regulations, policies, and work practices. This includes, but is not limited to:

1. Using personal protective equipment where required;
2. Actively participating in all required safety and health training;
3. Requesting information relating to job safety whenever needed;
4. Learning about the potential hazards of assigned tasks and work areas;

5. Observing health- and safety-related signs, posters, warnings, and directions;
6. Warning co-workers about defective equipment and other hazards;
7. Reporting any unsafe or unhealthy conditions immediately to a supervisor, and stopping work if it poses an imminent hazard;
8. Reporting all work-related injuries and illnesses promptly to a supervisor;
9. Cooperating with incident investigations to determine the root cause; and
10. Participating in shop safety inspections.

The Office of Environment, Health & Safety (EH&S)

EH&S provides consultation and support services to shop supervisors and employees to assist them in meeting their duties and responsibilities.

EH&S responsibilities include, but are not limited to:

1. Performing periodic and/or unscheduled safety inspections ([Appendix G](#)) and following up on the action items set forth in those inspections;
2. Notifying all shops when new safety programs, initiatives, processes, etc. are rolled out;
3. Being a point of contact and conduit of information for shops with safety concerns; and
4. Assisting with the implementation of the Shop Safety Program and all related programs.

The EH&S Specialists are also available to assist with the development and maintenance of training materials. These materials and support can include but are not limited to:

1. Shop Safety Manual;
2. Resources for monthly safety meetings; and
3. Assistance with inspections and incident investigations as requested or indicated by frequency and/or severity of incidents.

Identifying and Correcting Workplace Hazards

Inspection Program Overview

The purpose of the University of California Shop Safety Inspection Program is to identify and eliminate/reduce unsafe conditions that could result in injuries, illnesses, or property damage. Principal responsibility for the identification of hazards in the workplace lies with the Shop Supervisor. The supervisor is responsible for completion of periodic inspections to assess, record, and correct hazardous and potentially hazardous conditions that may exist.

Scheduled Safety Inspections

Shops must complete regularly scheduled workplace safety inspections. Annual self-inspections (in addition to EH&S inspections) shall be completed to detect and eliminate any hazardous conditions that may exist using the Shop Safety Self-Inspection Checklist ([Appendix K](#)). Targeted self-inspections, using documents such as the Flooring Inspection Checklist ([Appendix E](#)), can also be used to support hazard identification of higher frequency conditions such as those that can lead to trips and falls. The inspections must be documented with abatement of any hazards detected.

Unscheduled Safety Inspections

Supervisors must conduct unscheduled safety inspections whenever new substances, processes, procedures, or equipment are introduced into the workplace and present new safety or health hazards. Inspections must also be conducted when previously unrecognized hazards are identified.

Report of Unsafe Conditions

Employees are encouraged to report existing or potentially hazardous conditions or unsafe work practices to their shop supervisor so that corrective action (e.g., training, purchase of appropriate equipment, etc.) can be taken in a timely manner. A Hazard Notification/Safety Recommendation form can be used to report unsafe conditions.

Employees can also submit health or safety concerns through notifying and informing their supervisor or by contacting EH&S. Employees who report unsafe conditions cannot be disciplined, nor suffer any reprisals. Complaints can be made anonymously, if desired.

Safety Inspection Records

The shop supervisor is responsible for maintaining safety inspection records and reports. Records must include:

- Name of the inspector
- Date of the inspection
- All identified unsafe work conditions or work practices
- Corrective actions

Records should be filed in the Shop Safety Manual (or electronically) and kept for a minimum of five years.

Correcting Workplace Hazards

Identified hazards must be promptly investigated by shop supervisors. Corrective actions or plans with deadlines for completion must be developed and implemented based on the frequency and/or severity of the hazard. If an imminent hazard exists, work in the area should cease, and the appropriate supervisor notified. If the hazard can be corrected immediately without endangering employees or property, all personnel must be removed from the area, except those individuals who are necessary to correct the hazard. These individuals must have protective equipment and other necessary safeguards before addressing the situation.

Serious hazards that threaten life or property should be corrected as soon as practicable. Non-serious hazards should be assigned a correction date with a supporting correction plan completed and approved by EH&S. EH&S consultation is available to determine appropriate abatement actions.

Specific procedures that can be used to correct hazards include, but are not limited to, the following:

1. Lockout/Tagout (LOTO) of unsafe equipment;
2. Stopping unsafe work practices and providing retraining on proper procedures before work resumes;
3. Reinforcing use of and providing personal protective equipment;
4. Isolating or barricading areas that have chemical spills or other hazards to deny access until the appropriate correction is made; and
5. Reporting problems or hazardous conditions to a supervisor or EH&S.

Report Hazards Promptly

You can report hazards by using any of the following methods:

1. Contact
2. Call EH&S
3. Submit a Hazard Alert Form

Hazard Correction Report

A Hazard Notification/Safety Recommendation form can be used to document corrective actions, including projected and actual completion dates. The Self-Inspection Checklist can also be used for this purpose, if the hazard was identified during a regular self-inspection. If necessary, supervisors can seek assistance in developing appropriate corrective actions by contacting the EH&S Shop Safety Coordinator/Inspector. Hazard Correction Reports must be kept in the Shop Safety Manual (or electronically) for five years.

Communicating Workplace Hazards

Supervisors

Supervisors are the first point of contact and are responsible for communicating all safety and health issues to employees. All employees are encouraged to communicate safety concerns to their supervisor without fear of reprisal.

Safety Committee

Departmental Safety Committees can serve as another resource for communicating health and safety issues to employees. Shop personnel should be represented on the committee. Safety Committee minutes should be posted or made available at a convenient location for access by all shop employees. E-mail, distribution of written memoranda, or articles in internal departmental newsletters (if applicable) can also be used to communicate safety committee information.

Resources

While supervisors must provide employees with hazard information pertinent to their work assignments, information concerning safety hazards is available from a number of other sources. These sources include, but are not limited to, Job Safety Analyses (JSAs) ([Appendix H](#)), Standard Operating Procedures (SOPs), Safety Data Sheets (SDSs), container labels, equipment manuals, this Shop Safety Manual, EH&S newsletters and websites, and work area postings.

Emergency Response Plan/Emergency Action Plan

Shops must have an emergency response plan. Departmental Emergency Response Plans (ERPs) address life and safety issues during or after an earthquake, fire or flood, loss of critical infrastructure, a terrorist attack, civil unrest, or other calamity. Area Emergency Action Plans (EAPs) outline what to do during a catastrophic event to minimize damage to life and property. The EH&S Office or Office of Emergency Management can provide guidance and direction on the development of an ERP and EAP. Risk Management can provide guidance to departments in developing business continuity plans.

Incident, Injury, & Illness Reporting And Investigations

An incident is an unplanned event that results in injury, illness, or property damage. A near miss is an unplanned event that did not result in injury, illness, or damage, but had the potential to do so. Both incidents and near misses should be investigated to determine the root cause and to reduce or eliminate the hazards that contributed to the incident.

Reporting and Treatment

Employees who are injured or become ill at work must report the injury or illness immediately to their supervisor and personnel department. Employees will be provided with the appropriate level of medical care required for the injury or illness. Employees referred for treatment may be provided with a location-specific medical treatment referral form. If the injury requires more than first aid treatment, the Workers' Compensation Claim form should be given to the employee as well. These forms can be obtained from Risk Management.

All injuries must be reported to Risk Management within 24 hours. You can report injuries to Risk Management by:

- Calling the UC Injury reporting line
- Faxing a report to the Risk Management Office
- Emailing the Risk Management Office

Serious injuries must be reported to EH&S within 8 hours. Report serious injuries by calling EH&S. Serious injuries include death, amputations, concussions, crush injuries, fractures, burns, lacerations with significant bleeding or requiring stitches, or hospitalization (other than for observation) for greater than 24 hours. ***If in doubt, you should contact EH&S with any available information so they can determine whether reporting is necessary.*** EH&S must contact the California Occupational Safety and Health Administration (Cal/OSHA) to report the serious injury within 8 hours of knowledge to avoid a citation. An incident investigation will be conducted by EH&S for serious accidents, in conjunction with a representative from the injured employee's department.

Investigations

When incidents occur on the job, supervisors, in conjunction with EH&S Specialists must investigate them to identify the root cause or hazards that contributed to the incident. Supervisors must complete any repairs and implement any procedural changes to correct conditions contributing to the incident.

EH&S Specialists conduct incident investigations for workplace injuries, when it is evident that safety procedures need to be reviewed and improved, or as requested.

Incident investigations and near misses should be reviewed at your departmental safety meetings. EH&S Specialists are available to attend these meetings and help develop safety procedures to avoid future injuries.

Specific procedures that may be used to investigate workplace injuries ([Appendix C](#)) and hazardous substance exposures include:

1. Interviewing injured employee, supervisor, and/or witnesses;
2. Examining the injured employee's workstation for causative factors;
3. Reviewing established procedures to ensure they are adequate and implemented accordingly;
4. Reviewing training records of affected employees;
5. Determining potential contributing factors to the incident;
6. Taking corrective actions to prevent the incident/exposure from reoccurring; and
7. Documenting all findings and actions taken.

Training

Effective dissemination of safety information is essential for a successful safety program. All employees must be trained in general safe work practices including specific instructions on hazards unique to their job assignment. Training must be completed before the use of any dangerous equipment, exposure to any known hazardous conditions, or when new hazards are identified.

Supervisors are responsible for ensuring their employees receive appropriate safety training and for documenting that this training has been provided. Section 2 of this manual provides more information on training, including an

outline of required trainings for shop personnel. Attendance at training classes and safety meetings is required. Documentation of individual safety training and safety meetings ([Appendix M](#)) must be kept by the supervisor in the Shop Safety Manual for five years.

Recordkeeping

Records of occupational injuries and illnesses, medical surveillance, exposure monitoring, inspections, trainings, and other safety activities must be maintained for specific periods of time. Records must be kept in either the Shop Safety Manual or employee personnel files following university guidelines. Department personnel representatives must present them to Cal/OSHA or other regulatory agency representatives if requested. EH&S may review these records during routine compliance inspections.

The following are examples of documents that must be kept on file in the department for the minimum times indicated below:

1. Copies of safety inspection forms = one year
2. Copies of all hazard identification forms = one year
3. Copies of all incident investigations = three years
4. Copies of all safety postings and safety meeting agendas = one year
5. Copies of all employee training checklists and related training documents = three years
6. Copies of employee exposure records, or other employee medical records = 30 years or for the duration of each individual's employment if > 30 years. Access to employee medical records will be limited in accordance with university policies, state, and federal guidelines.

Compliance

Compliance is critical for an effective IIPP. Managers and supervisors must serve as role models for working safely and provide resources necessary to ensure a safe work environment for their employees. All employees are required to follow safety policies and operating procedures. Employees will be provided with safety training and information to complete all assigned duties safely. When needed, employees will be provided with additional training and information, or retraining to maintain their knowledge of campus safety policies and procedures.

Employees who demonstrate safe work practices should be rewarded through the use of performance evaluations or incentive programs. Any employee who demonstrates repeated unsafe, unhealthy work practices will be subject to corrective action and/or disciplinary action. Disciplinary action must conform to UC policies and/or corrective bargaining agreements. If the offense is egregious or willful, the action may result in immediate disciplinary action. The Employee Labor Relations Department must be consulted on any disciplinary matter as it relates to compliance with this program.