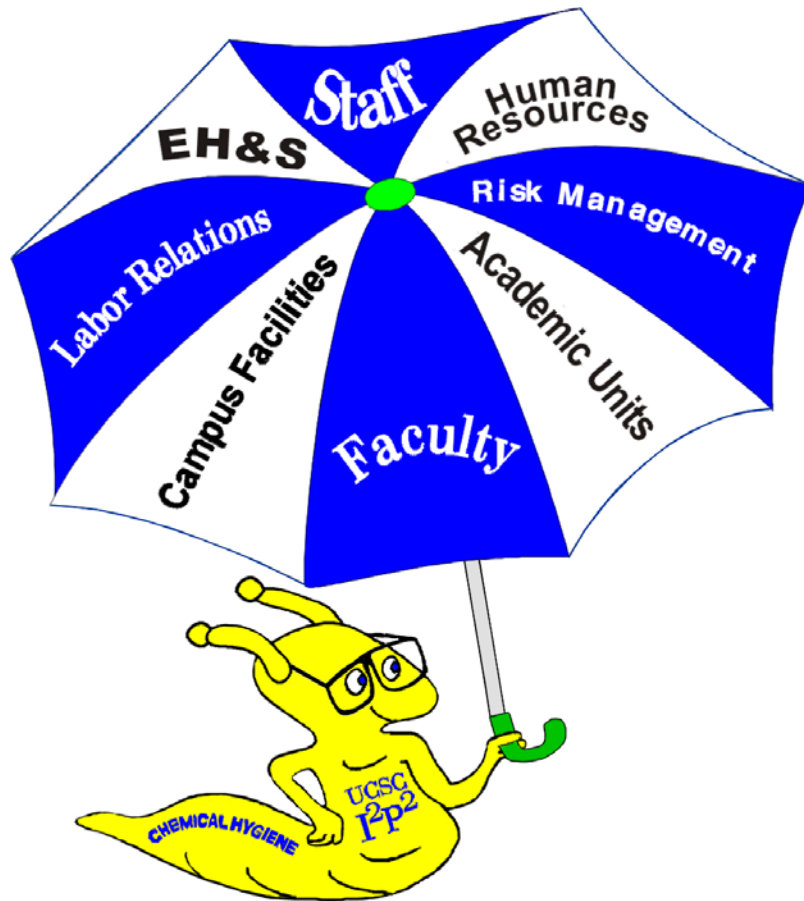


Injury and Illness Prevention Program



University of California Santa Cruz

Departmental Policy for Compliance with California Code of Regulations 8-3203

IIPP DEPARTMENTAL PLAN

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STATEMENT OF PURPOSE

The intent of the Injury and Illness Prevention Program legislation is to reduce work-related injuries and illnesses in the workplace. The mechanism for accomplishing this intent is by requiring employers to formalize and document compliance with existing health and safety requirements, and to establish a framework for developing and implementing new programs. Examples of programs that should be addressed within the scope of this organizing program include Hazard Communication, Laboratory Safety/Chemical Hygiene, Office Safety, Campus Emergency Operations and Disaster Preparedness Plans, Fire Prevention, Shop Safety, as well as Personal Protection Equipment programs and other health and safety-related policies and procedures.

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](#).

- **Primary responsibility for the program resides with the Unit Heads and Department Supervisors of each department.**
- **All employees at UCSC will be covered by a written Injury and Illness Prevention Program.**
- **EH&S will be available to assist with this process.**

POLICY

The University of California, Santa Cruz is committed to maintaining a safe environment for its students, academic appointees, staff, visitors, and members of the general public. Further, it is dedicated to minimizing the impact of its operations on the environment surrounding its campuses and laboratory sites.

The University meets these policy objectives by:

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

DEFINITION OF RESPONSIBILITIES

The **Chancellor** has ultimate responsibility and authority for implementing and enforcing the campus Injury and Illness Prevention Plan.

The **Vice Chancellors** are directly responsible for ensuring that units under their authority comply with the campus Injury and Illness Prevention Plan and all environmental health and safety policies.

Deans, Unit Heads, Board Chairs, Principal Investigators and Supervisors are accountable for establishing and maintaining programs to ensure compliance within their areas and for maintaining a safe and healthy environment.

Environmental Health and Safety is responsible for monitoring safety education programs as well as developing programs to ensure compliance with state and federal laws and regulations as well as campus environmental health and safety policies. EH&S is authorized to inspect all areas of the campus.

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

AUTHORITY AND RESPONSIBILITY

REQUIREMENT

Effective July 1, 1991, every employer shall establish, implement and maintain an effective Injury and Illness Prevention Program. The Program shall be in writing and shall identify the person or persons with authority and responsibility for implementing the Program. [8 CCR §3203(a)(1)]

IMPLEMENTATION

Written Program

The Department's Injury and Illness Prevention Program must be based on a written document that addresses the minimum elements of the standard.

This document, in conjunction with use of the referenced sections, constitutes the written IIPP for this UCSC Department.

Designation of Person or Persons with Authority and Responsibility

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

The department head or unit supervisor is the individual identified as having primary responsibility for the IIPP in their department. This individual may elect to delegate authority for implementing the program; however, this delegation will not eliminate their personal responsibility for the program. Section 2 provides a mechanism for documenting the various levels of authority and responsibility expected within a unit.

Summary of Manager/Supervisor responsibilities under the IIPP

1. Establish responsibilities and designate person(s) with responsibility for implementing the IIPP for this department. This person will be referred to as the department's IIPP coordinator.
Complete the *IDENTIFICATION OF RESPONSIBLE PERSONS* form (Section 2) and send a copy to EH&S.
2. Develop methods to ensure compliance with provisions of the Injury and Illness Prevention Program.
3. Identify training needs and implement training programs for current employees, new employees, and when new hazards are introduced or employees are given new job assignments.
4. Conduct scheduled inspections and develop methods to identify health and safety hazards.
5. Conduct accident investigations and initiate procedures to eliminate identified hazards.
6. Maintain records of all IIPP program elements for the time periods specified in Section 6.

Summary of Employee responsibilities under the IIPP

1. Participate in the Injury and Illness Prevention Program by becoming familiar and complying with provisions of the plan.
2. Work in a safe, responsible manner and in accordance with health and safety training.
3. Report unsafe conditions or potential hazards.

COMPLIANCE WITH SAFE WORK PRACTICES

REQUIREMENT

The Program shall 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 action or any other such means that ensures employee compliance with safe and healthful work practices. [8 CCR §3203(a)(2)]

IMPLEMENTATION

The University of California Santa Cruz Policy on Environmental Health and Safety requires all employees to be knowledgeable of, and accountable for complying with applicable safety regulations governing specific job duties or activities they are assigned to carry out. Supervisors are responsible for ensuring their employees are informed about and comply with health and safety responsibilities and provisions of the IIPP.

The system this department uses for ensuring compliance with safe work practices and provisions of the IIPP includes:

Methods

- Implementing and enforcing existing personnel policies and collective bargaining agreements concerning employee recognition and discipline.
- Training Programs
- Other: _____

References

Refer to appropriate university personnel policies and collective bargaining agreements for specific information on recognition and disciplinary action. Questions concerning these issues may be directed to the Employee and Labor Relations Office.

COMMUNICATING SAFETY ISSUES

REQUIREMENT

The Program shall 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 §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 meet the following objectives:

1. Effectively communicate safety rules, job-specific hazards, 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.
2. Effectively explain the requirements to comply with safe work practices, including mechanisms for recognition of compliance and disciplinary actions for violations.

Methods

This department uses the following methods for facilitating safety and health communication:

- Encourages employees to report workplace hazards to their supervisors and informs them of their right, if they feel it is necessary to report anonymously to avoid reprisals, to do so by using the **Hazard Alert Form** in **Section 3**
- Maintains designated safety and health bulletin board(s) or other areas where safety forms, such as the *Hazard Alert* form, Cal-OSHA poster, emergency procedures, SDS locations, etc. are available to employees. The department IIPP coordinator designated on the *IDENTIFICATION OF RESPONSIBLE PERSONS* form has been appointed to keep the information current and to act as liaison to EH&S.
- Training Programs
- Staff Meetings
- Written Communications (memos, email, newsletters, signage, pamphlets, binders etc.)
- Department Safety and Health Committee
- Other methods include: _____

IDENTIFYING WORKPLACE HAZARDS

REQUIREMENT

The Program shall include procedures for identifying and evaluating workplace 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;
- (C) Whenever the employer is made aware of a new or previously unrecognized hazard.

[8 CCR §3203(a)(4)]

IMPLEMENTATION

Inspections

Use department-specific **Inspection Checklists** and/or task-specific job hazard analysis to conduct ongoing inspections of your operations. The inspection checklist examples provided in **Section 5** should be revised to meet the specific needs of your operations. Documenting your inspections are a mandatory component of this IIPP.

EH&S will also perform inspections of University locations on request, as part of a regular program of inspections, or in response to employee complaints. EHS also conducts periodic audits of your Departmental Injury and Illness Prevention Program. These audits should be filed as part of this IIPP.

Methods

This department identifies workplace hazards by conducting scheduled periodic inspections and documenting all findings.

This department identifies workplace hazards by use of the **Hazard Alert Form**.

Other methods
include:

PROCEDURES FOR CORRECTING UNSAFE OR UNHEALTHY CONDITIONS

REQUIREMENT

The Program shall 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 designated to correct the hazardous condition shall be provided the necessary safeguards. [8 CCR §3203(a)(6)]

IMPLEMENTATION

Periodic inspections and use of the **Hazard Alert Form** provide methods of identifying existing or potential hazards in the workplace. Each department is responsible for developing mechanisms to correct hazards as they are identified. Where a hazard exists which is not immediately dangerous and cannot be fixed within a short time, a written outline or documentation showing the proper steps are being taken to seek assistance or funding as necessary to abate the hazard should be part of the IIPP records.

Methods

This department uses the following methods to correct hazards or unsafe conditions identified in this workplace:

- Supervisors, Unit Heads, or the EH&S Director may order immediate cessation of any activity creating an imminent hazard. The activity may only be resumed with approval from EH&S in consultation with the appropriate Vice Chancellor, Dean, Unit Head, or Board Chair.
- Hazards that are readily correctable shall be remedied as soon as reasonably possible through normal departmental procedures..
- Hazards which are not immediately correctable (or completed within 30 days) shall be reported to EH&S. EH&S shall assist departments with initiating corrective action and ensure that appropriate interim measures are implemented until such time as the hazard is eliminated.
- Correction of workplace hazards shall be documented and tracked from initial identification through elimination using documentation appropriate to the scope and complexity of the incident and its resolution.
- Other methods include: _____

PROCEDURES FOR INVESTIGATING INJURIES AND ILLNESSES

REQUIREMENT

The Program shall include a procedure to investigate occupational injury or occupational illness [8 CCR §3203(a)(5)]

IMPLEMENTATION

Departmental Responsibility

All procedures outlined in the [Workers Compensation Reporting Procedures](#) must be followed. Following any incident, The [Employer's First Report of Injury \(EFR\)](#) form must be completed and submitted per the instructions and deadline on the Risk Services page. Steps taken to eliminate the cause of the injury, illness, or accident must be documented and kept with departmental IIPP records.

Workers' Compensation Claim Reporting Procedures must be implemented when you have knowledge of an injury or illness. California law requires that each occupationally injured employee receive an "Employee Claim for Workers' Compensation Benefits" form within one working day of the time an injury is reported to the employer. If you cannot personally provide the form to the employee, you should mail it to them. Contact [UCSC Risk Services](#) if you need help with Workers' Compensation-related issues.

Environmental Health and Safety's Responsibility

Each accident, injury, or illness reported is reviewed for an appropriate course of follow-up action. EH&S will respond to specific requests for assistance as resources permit, however, **primary responsibility for identifying, investigating, correcting, and documenting workplace situations which result in injury or illness rests with the department.**

Methods

This department uses the following methods to investigate occupational injuries and illnesses that occur in this workplace:

- Documents findings related to occupational injuries or illnesses.
- Documents and tracks status of all hazards associated with injuries and illnesses.
- Other methods include: _____

SAFETY AND HEALTH TRAINING

REQUIREMENT

The Program shall 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 §3203(a)(7)]

IMPLEMENTATION

Supervisors must ensure training requirements of the IIPP are fulfilled since they have direct responsibility for: (1) being familiar with safety and health hazards to which their employees may be exposed, (2) being able to recognize these hazards and the potential effects specific hazards may have on their employees, and (3) the rules, procedures and work practices for controlling exposure to hazards. Supervisors must convey this information to employees through setting a good example, by providing clear instructions, and ensuring employees fully understand and follow safe procedures.

DOCUMENTATION

Written documentation of safety training is required. You must include the name of the person trained, training dates, type(s) of training and a description of how the training was provided. These records must be maintained as part of the IIPP for a minimum of three (3) years. Training taken online or accessed via the [Learning Management System](http://learningcenter.ucsc.edu/) (<http://learningcenter.ucsc.edu/>) is recorded in that database and can be referred to rather than retaining duplicate documentation.

The training forms in **Section 4** have been designed to assist you with assessing training needs, documenting training activities, and tracking new hires. You should complete a **Training Needs Identification Worksheet** for each employee or job classification. You should also ensure each employee has had the opportunity to read and review this IIPP and sign the **Employee Orientation** in **Section 4**.

Methods

Safety and health training requirements identified in above elements (A) through (F) for employees in this department are accomplished through:

- Use of training needs identification and documentation aids contained in **Section 4** (a through e) in conjunction with various training formats including one-on-one, group training sessions, on-the-job training in equipment or tasks, or online courses.
- Other methods include: _____

RECORDKEEPING AND DOCUMENTATION

REQUIREMENT

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 §3203(b)]

IMPLEMENTATION

Recordkeeping as a means of demonstrating compliance is essential. All documentation regarding training, inspections, accident investigations, and hazard correction must be part of the IIPP. The table comprising **Section 6** summarizes recordkeeping requirements. As a minimum these records must be maintained for at least three years. Records may be electronic or on paper and can be held in any location or organized by any method so long as they are easily accessible by the coordinator and can be provided to EHS, an OSHA inspector, or any other auditing party within a reasonable time from the request.

The system developed for this Injury and Illness Prevention Program is based on a concept that should dramatically simplify the documentation burden on departments, especially those with a small workforce or uncomplicated, low-hazard workplace.

Methods



Records are maintained in accordance with the guidelines in **Section 6**.



Records for this department are maintained in the following locations:
