



THE CLAREMONT COLLEGES

SERVICES

# **Injury & Illness Prevention Program**



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## **Injury & Illness Prevention Program**

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Injury and Illness Program Responsible Manager: John Moe, Assistant Vice President for Central Facilities Services

Approved:

  
Stig Lanesskog, TCCS Chief Executive Officer

Date:

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For questions on the content of the Injury and Illness Prevention Program, contact Jay Brakensiek, TCCS Environmental Health & Safety Manager.

It is the policy of the Claremont Colleges Services (TCCS) to provide a safe and healthy environment for all employees, to comply with all workplace safety regulations, and to apply best practices in Health and Safety where practical. This policy is extended to all students, visitors, and community surrounding the campus. The Injury and Illness Prevention Program (IIPP) is the key guidance document for all employees to comply with Cal/OSHA regulations, California Code of Regulations, Title 8, Section 3203, and the key guidance document for the structure of the TCCS Health and Safety Program. This is the basis for prevention of injuries and exposures, key to reducing worker's compensation costs, and key to implementing a "Best Practices Safety Culture," with a goal of zero accidents.

### **Major Elements**

The IIPP is made up of eight parts as required by California regulations:

- Responsibility - The person responsible implementing the IIPP.
- Compliance - Description of who is covered by the IIPP.
- Communication - Mechanisms to distribute information.
- Hazard Assessment - Means to identify and evaluate hazards.
- Accident/Exposure Investigation- How we will investigate accidents and exposures.
- Hazard Correction - How we correct hazards that are found.
- Training and Instruction - How we train employees.
- Recordkeeping - How we keep records of all the above.

## **1. RESPONSIBILITY**

The manager with final authority and responsibility for implementing the IIPP at The Claremont Colleges Services is John Moe, Assistant Vice President for Central Facilities Services.

Department Directors & Managers are responsible for implementing and maintaining the IIPP in their work areas and for answering employee questions about the IIPP. A copy of this IIPP is available on the TCCS Intranet under the Environmental Health & Safety department page. Employees are responsible for complying with the elements of the IIPP.

The TCCS EHS Department is responsible for providing expert support and training so that supervisors and managers can create a safe working environment in their departments. They are available to answer more complex Health and Safety questions, assist in serious accident investigations, and regulatory agency inspections. The EHS Department provides support to TCCS at all times and on a proactive basis, and to the The Claremont Colleges (TCC) upon request for specific issues.

## **2. COMPLIANCE WITH THE IIPP**

All TCCS employees, including managers and supervisors, are responsible for complying with the IIPP, and with Cal/OSHA regulations to provide a safe and healthful work practices. To do this we will do the following:

- Train employees on the elements of the IIPP.
- Evaluate the safety performance of all employees, including supervisors and management.
- Provide training to employees whose safety performance is deficient.
- Recognize employees who perform safe and healthful work practices, and disciplining employees for failure to comply with the IIPP, Safety Policies & Procedures, and Cal/OSHA regulations.

## **3. COMMUNICATIONS**

All managers and supervisors are responsible for communicating with employees about safety and safety hazard recognition and control in a way that is understandable by all employees. TCCS requires all employees to inform their managers and supervisors about workplace safety hazards. There will never be a consequence of reporting a safety hazard or stopping a job due to a safety hazard. This right is protected by law.

The communication system includes the following:

- Safety Training including a New Employee Safety Orientation.
- Training on the elements of the TCCS IIPP Program.
- Safety training programs.



- Regularly scheduled safety meetings.
- Posted or distributed safety information including data on accident rates by department.
- A system for employees to anonymously inform management about workplace hazards.
- Employees may call the “(909-607-4EHS)” number or contact ehs@claremont.edu to report any safety hazards anonymously.

#### **4. HAZARD IDENTIFICATION AND ASSESSMENT**

Periodic inspections to identify and evaluate workplace hazards shall be performed by a person able to identify safety hazards in the area they inspect. These inspections shall be the responsibility of the manager/supervisor of each area. These inspections are performed:

- When we initially established our IIP Program
- When new substances, processes, procedures or equipment which present potential new hazards are introduced into our workplace
- When new, previously unidentified hazards are recognized
- When occupational injuries and illnesses occur, and
- Whenever workplace conditions warrant an inspection

Hazard identification is accomplished in the following ways:

- Each employee should inspect their tools, equipment, and work area prior to and during use for safety.
- Supervisors should regularly inspect work areas and operations under their supervision for safety hazards on a regular basis. This is in addition to the required quarterly inspections. Any deficiencies should be noted and corrected, with the corrections recorded.
- Managers should monitor safety inspections and deficiency corrections, and follow-up on uncorrected deficiencies.
- Each Departmental Manager shall conduct quarterly inspections of their areas and record the results.
- After these initial inspections are conducted by each Department, for more complex issues, the Departmental Manager may contact Environmental Health & Safety for assistance as required.
- Employee communication to the TCCS Safety Committee may trigger hazard identifications and inspections.
- Maintenance requests may trigger hazard identification and correction when referred by the TCCS Central Facilities Services Director.
- Employee-supervisor communications may trigger hazard identification and correction.
- Calls to the Unsafe Condition Reporting Hotline, 7-4EHS (909-607-4EHS) may trigger an inspection.
- An employee may complete an “Unsafe Condition Report,” Attachment 1.

Any safety hazards shall be documented, with corrective actions promptly initiated. Many safety hazards can be corrected by the supervisor of the area. Other hazards will require work orders and written communications to management.

The TCCS Safety Committee will encourage employees to report and correct potential safety issues to committee members, the Department Manager, and to EH&S for investigation. Safety committee members will make efforts to respect an employees' request for confidentiality regarding reported safety issues where the request does not conflict with the correction or control of that issue.

**CALOSHA prohibits an employer from taking adverse action against any employee for reporting potential workplace safety hazards. Employees are required to report all safety hazards. TCCS management requires all employees including managers to follow this requirement.**

Hazardous chemical use may require a higher level of surveillance. TCCS's policy is to use the least toxic chemicals possible. Cal/OSHA requires specific training based on potential hazards that may be encountered and additional written programs and training may be required. Examples are: hazard communication training, laboratory safety training, ergonomics training, confined space training, and respiratory protection training.

### **HALTING OPERATIONS**

An EHS Safety Professional in TCCS's Employee Health and Safety shall have the authority to order a stop to any activity when work hazards, which present an immediate threat to life, health, or safety, are encountered. When such a work shutdown is ordered, the TCCS Executive Director, Vice President of Management and Planning, and the Department Head shall be notified as soon as possible.

### **5. ACCIDENT/EXPOSURE INVESTIGATION**

Each accident or near miss (an accident that was a "close-call") shall be investigated by the employee's supervisor to prevent reoccurrence with a documentation of the investigation. The department supervisor is required to complete a "Supervisor's Report of Occupational Accident" form for any injury accident (Attachment 2) in addition to any paperwork required by the Workers' Compensation & Disability Office.

This report (Attachment 2) shall be sent by the supervisor to the Department Manager, EHS, and Worker's Compensation. EHS may be contacted to answer questions as to the completion of this report.

**ALL SERIOUS ACCIDENTS MUST BE REPORTED** by the supervisor to TCCS EHS and Worker's Compensation IMMEDIATELY. CAL/OSHA has an 8-hour notification requirement from the time of the accident that must be met to prevent major penalties.



**IMPORTANT:** In the event of an afterhours SERIOUS accident (see below), contact Campus Safety 7-2000, and specifically request that Campus Safety contact an EHS staff member.

A **serious accident** is defined by CalOSHA (CCR, Title 8, Section 330) as:

Any injury or illness occurring in a place of employment which requires:

- Inpatient hospitalization for a period in excess of 24 hours for other than medical observation, or
- An employee suffers a loss of any member of the body, or
- Suffers any degree of permanent disfigurement, or
- An accident resulting from violation of section 385 of the Penal Code. The simplified form of section 385 states that any person who personally or through an employee or agent places basically anything within six feet of a high voltage (over 750 volts) overhead conductor is guilty of a misdemeanor; and it is a misdemeanor to own, operate, or employ any person to operate basically any movable equipment that could impact the overhead high voltage conductor, unless there is posted and maintained in plain view of the operator a durable warning sign legible at 12 feet, reading: "Unlawful to operate this equipment within six feet of high voltage lines." (See Section 385 of the Penal Code for exact code wording and definitions).

Reporting **does not cover:**

- Any injury, or illness, or death caused by an accident on a public street or highway, or by the commission of a California Penal Code violation, except for section 385, noted above.

The Manager/Supervisor shall complete a TCCS "Supervisor Accident Investigation" (Attachment 2) to determine the cause of the accident and recommend corrective actions to prevent future similar accidents.

EH&S may conduct an independent investigation for serious accidents.

A job safety analysis (JSA) may be requested of the department by EHS or the TCCS safety committee, where the investigation shows that a more complex review of the job or operation is required.

## **6. HAZARD CORRECTION**

Hazards should be corrected as rapidly as possible. In the event of a danger or hazard that could cause serious injury, immediate correction by the person making the discovery is required, or the operation or machine must be taken out of service. Electrical and mechanical devices should be "locked out." If a "lockout" is not possible, a "red tag" noting the device shall not be used must be affixed to the device. Any hazardous locations, machinery, or processes shall be "RED TAGGED" as "Out of Service" until the hazard is corrected. Only EHS Staff or the supervisor putting on the RED TAG in consultation with an EHS staff member may remove the tag.

In the event a serious or dangerous condition that is an imminent danger is discovered the employee's supervisor, TCCS EHS office, and Campus Safety must be immediately notified. Once notified, the supervisor is responsible for abatement or mitigation of the situation to eliminate the imminent danger.

If the hazard cannot be abated or mitigated to correct the imminent threat in an immediate fashion to protect other employees from exposure, additional actions may be required. These may include; providing written notification to all affected employees, evacuation the affected area, and notifying the appropriate regulatory agencies, including Cal/OSHA. TCCS EHS shall be contacted immediately if regulatory agency involvement becomes necessary.

Hazard correction and control may include:

- Engineering out the hazard by changing the operation so the hazard no longer exists;
- Administrative changes so that personnel are no longer exposed to the hazard, or,
- Personal Protective Equipment to prevent damage from hazards if engineering and administrative controls are not available.
- Facility maintenance should be contacted to provide needed corrections through the use of work orders. Contractors may be utilized where the expertise needed is unavailable in-house.

Documentation of measures taken to correct or control hazards are to be maintained by the supervisor of each department.

## **7. TRAINING AND INSTRUCTION**

When a new employee begins work at TCCS, or changes job functions with new assignments, safety training shall be provided by the supervisor to train the employee on any hazards present, and on the safe operating procedures of the new job. It is the supervisor's responsibility to review any job transfers or changes to determine whether additional training is necessary.

All new employees are to receive training on the following:

- The Injury and Illness Prevention Plan
- Hazard Communication Program
- Emergency Plan (disaster/fire safety)
- Ergonomics

Employees will also receive a copy of the latest version of the "Environmental Health & Safety Handbook for Employees." Each new employee is required to acknowledge receipt of this information by signing the page located in the back of the booklet and returning it to their supervisor. This is available at the TCCS EHS website at <http://www.TCCS.claremont.edu/ehs/>.

All Managers and Supervisors are responsible for developing Safe Operating Procedures for operations under their control, and training each employee on these operating procedures.



Additional activities may require additional training. These situations need to be anticipated and evaluated by each manager and supervisor, and training requested with sufficient advance notice. These activities may include:

- Hazardous Chemical Use
- Fall Protection
- Abrasive Blasting
- Welding, cutting, & brazing
- Grinding of silica containing concrete
- Respirator use
- Asbestos and lead paint work

Training shall be provided to employees initially and on an ongoing-refresher basis at least every other year. Departmental managers are responsible for arranging and scheduling training. Certain specific training sessions, such as respirator fit testing and the use of hearing protection, shall be provided as required by regulation and are discussed in detail in other modules of the safety program.

- An all-college supervisor safety-training program will be provided by EHS with a set curriculum and course dates.

All training shall be documented. A training roster is found in Attachment 3.

### **TCCS SAFETY COMMITTEE**

TCCS's Safety Committee is chaired by the TCCS Environmental Health & Safety Manager. Standing members of the safety committee shall be:

- Environmental Health & Safety
- Worker's Compensation & Disability Administrator
- Central Facilities Services Director
- Human Resources
- Campus Safety
- Emergency Preparedness Manager
- TCCS Insurance Administrator
- Other units as designated

Each meeting the Safety Committee will hear the reports of committee members on the following:

- Reports of identified and corrected safety issues
- Accident investigations
- Identified safety issues and corrective actions
- Any recommended safety policy changes
- Discipline of employees for safety infractions



- Recognition of employees for exemplary safety behavior and actions
- Training report
- EHS activity report
- Regulatory agency activity and citation report
- Implementation and review of employee safety suggestions
- Review of TCCS vehicle accidents

The safety committee keeps summary minutes of the activities of each meeting make these minutes available to all employees upon request. Distribute the minutes of each meeting to department directors, supervisors, EHS, and safety committee members.

#### **8. Records Retention:**

- Records of Safety Committee Meetings shall be kept for 3 years
- Records of hazard identifications and corrections shall be kept for 3 years
- Safety Training Records shall be kept for a minimum of 3 years, with the exception of asbestos training records, which shall be kept for the duration of employment plus 30 years.
- Industrial Hygiene monitoring (air, sound, other) data shall be kept for the duration of employment plus 30 years. The records repository shall be the Human Resources Office.
- Asbestos training, air monitoring, and abatement records shall be kept for the duration of employment plus 30 years. The records repository shall be the Human Resources Office.

**IIPP Attachment 1**  
**ATTACHMENT B: UNSAFE CONDITION REPORT**

This form is to be completed by employees and returned to their supervisor. This form must reach the department no later than one day after completion for serious unsafe conditions and no more than three days for other unsafe conditions. Conditions which may cause immediate injury should be reported to your Supervisor by phone immediately.

**DATE:**

**TIME:**

**TO:**

**FROM:**

(Name of person filling out form and job title)

**DEPARTMENT:**

I estimate this unsafe condition is: (circle one)

**LIFE-THREATENING**

**SERIOUS**

**MINOR**

**Describe unsafe condition location:**

**List any equipment model numbers and identification numbers for equipment, buildings, etc. involved in UNSAFE CONDITION:**

**What actions do you recommend to correct the unsafe condition:**

**Discussed with supervisor** on(name) (date) (time)

**ACTION TAKEN BY SUPERVISOR TO CORRECT HAZARD/DATE:**

**NO EMPLOYEE will be retaliated against for reporting hazards or potential hazards or for making suggestions related to safety.**



## IIPP Attachment 2 Supervisor Accident Investigation Report

### IMPORTANT!!

It is very important to investigate the accident as opposed to the results of the accident. For example, you are not investigating a broken arm, but the factors leading to it. An accident or incident can be a fall, slip, trip, slide, strike against or other contact, being caught in or between, eruption or explosion, burn, or improper movement. Results can range from a simple annoyance to a fatality.

The examples of corrective actions are designed to help you determine some possible actions. It is important that some effective action is taken, including improving management systems and personal performance as management personnel. This is not intended to indict, but to effect realistic corrective action.

#### WHAT ACTION(S) CAN PREVENT A RECURRENCE?

(Use this information to help your thought process while attempting to determine all possible contributing factors)

**Consider these possible actions, but do not limit yourself. There are numerous possible combinations, and serious thought will be needed to be effective**

I. Contributing causes of accidents/incidents		
a. Supervisory Safety Performance		
1.	Inadequate or incomplete instruction	Enhance training and follow-up.
2.	Safe and healthful work practices not enforced	Stronger and more consistent enforcement
3.	Safety not planned as part of job	make safety considerations part of planning any job
4.	Infrequent associate safety contacts	Talk about frequently with associates
5.	Inadequate or incomplete hazard correction	Document completion of corrections for identified hazards
6.	Safety devices not provided	Assure safety devices present and enforce use
b. Mental or Emotional Condition of Associate		
1.	Lack of awareness	Evaluate training tactics
2.	Inattention	Find out why
3.	Improper attitude lack of (safety cooperation, etc.)	Use behavior modification, incl. discipline if necessary
4.	Nervous	Find out why
c. Physical Condition of Person		
1.	Fatigue	Evaluate for personal problems or needed shift adjustment
2.	Deafness or poor hearing	Modify job per ADA requirements or evaluate placement
3.	Poor eyesight	Modify job per ADA requirements or evaluate placement
4.	Associate not physically matched to the job	Modify job per ADA requirements or evaluate placement
5.	Physically challenged	Modify job per ADA requirements or evaluate placement
II. Immediate cause of accidents/incidents		
a. Unsafe acts		
1.	Protective equipment or guard provided, but not used	Evaluate rules and correct training and enforcement tactics
2.	Poor handling (i.e.: not allowing for sharp or slippery surfaces, poor lifting, etc.)	
3.	Proper tools/equipment provided, but not used	Evaluate rules and correct training and enforcement tactics
4.	Hazardous movement (i.e.: running, jumping, climbing, etc.)	Evaluate rules and correct training and enforcement tactics
5.	Horseplay	Evaluate rules and correct training and enforcement tactics
b. Unsafe Conditions		
1.	Absent or ineffective safety device	Determine current requirements and update, if necessary
2.	Poor housekeeping	upgrade and enforce housekeeping standards
3.	Defective machines, equipment, or tools	Determine current requirements and update, if necessary
4.	Improper dress or apparel for the job	Evaluate, upgrade, and enforce safe dress standards
5.	Poor illumination, ventilation, etc.	Upgrade and/or repair

## IIPP Attachment 2 Supervisor Accident Investigation Report

# MANAGER/SUPERVISOR ACCIDENT INVESTIGATION

Complete and submit within 12 hours of accident. Call Safety Department immediately if serious injury occurs.

Facility	Dept. No.	Shift	Date
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### EMPLOYEE DATA

Employee Name	Start Date	Job Title	Employee ID#
Place where accident or incident occurred	Date of Accident	Time of accident _____am_____pm	
How long in department or job?____ Job specific training conducted? Yes No		Did accident happen during: Regular shift? Overtime? If O.T. How many hours?_____	

### SUPERVISOR'S REPORT

Detailed description of employee's activities at time of accident/incident	
Nature of injury, if any (describe injury; indicate part of body, right or left, etc.)	
<b>Contributing</b> Causes (see examples on back; <b>Be honest</b> )	
<b>Immediate</b> causes (see examples on back; <b>Be honest</b> )	
Conclusions (Link contributing and immediate causes together to help track series of events)	
Action Taken to prevent recurrence ( <b>Remember, this is the objective of this exercise</b> )	
Is safety assistance recommended? Yes No	
Was first aid administered? Yes No If yes, by whom?	
Were there witnesses? Yes No (If yes, give name and brief account-attach separate paper, if necessary)	Was Medical treatment necessary? Yes No (If yes, give facility name, address, and phone number)
Is lost time anticipated? Yes No	If yes to either, how long?__
Is modified duty anticipated? Yes No	If modified duty, what job?
Supervisor's Signature	Date:
Department Manager's Signature	Date:

TCCS Injury and Illness Prevention Program



## IIPP Attachment 3 Training Roster

Date: \_\_\_\_\_  
 Location: \_\_\_\_\_  
 Instructor: \_\_\_\_\_

School: \_\_\_\_\_  
 Training Subject: \_\_\_\_\_

Print Name	Sign Name	Employee ID Number	Email/Phone
1			
2			
3			
4			
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This form is to be retained by the originating School or Department for a period of three years.