



Whittier College

Illness & Injury Prevention
Program

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ILLNESS & INJURY PREVENTION PROGRAM

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Illness & Injury Prevention Program

1.0 References

Title 8, California Code of Regulations, § 3203 (8 CCR 3203)
Whittier College Hazard Communication (HAZCOM) Program.

2.0 Administering Agency

State of California, Division of Occupational Safety & Health
(Cal/OSHA).

3.0 Policy

It is the intent of Whittier College to develop policies and procedures to comply with Labor Code §6401.7 (SB 198) and the General Industry Safety Order §3203, "Injury & Illness Prevention Program."

It is the policy of Whittier College, insofar as is reasonable and practical, to ensure that employees know the potential hazards of their work activities and environment. Whittier College will provide employees safety training to prevent injury and illness. No employee will engage in or be required to perform any work that will expose employees or others to unreasonable danger or risk of injury or illness.

Departments must periodically inspect for unsafe conditions and work practices and correct any deficiencies found. Additionally, the Chemical Hygiene Officer and/or their designee, Human Resources, or a designee from the safety committee will conduct periodic inspections for unsafe workplace conditions and practices as needed.

4.0 Purpose

Employees (when mentioned includes student employees) have a right and a need to know the potential hazards of their work activities and their work environment, as such knowledge is essential to reducing the incidence and cost of occupational injuries and illnesses. The Whittier College Hazard Communication (HAZCOM), Program provides a more detailed description of the Injury & Illness Prevention Program (IIPP), as it pertains to hazardous materials.

The Whittier College IIPP is intended to inform the employee of safety precautions necessary to prevent or minimize occupational injuries, illnesses and hazards. This is accomplished through safety meetings, training, reporting programs, and safety audits.

5.0 Scope

- 5.1** This program applies to all Whittier College employees, including compensated student workers. Addressing non-occupational injuries and illnesses of student workers is not part of the IIPP. Activities involving hazardous materials are also covered by the Whittier College HAZCOM Program and Chemical Hygiene Plan.
- 5.2** The HAZCOM program addresses potential occupational hazards known to be present in the workplace, that employees may be exposed to under normal conditions or in foreseeable emergencies.

6.0 Responsibilities

6.1 Injury and Illness Prevention Program Administrator

Description of Authority and Responsibility:

- Ensure that Whittier College's IIPP policies and practices are implemented.
- Ensure that employees are provided a safe and healthy work place.
- Ensure that operations are in compliance with the IIPP and applicable federal, state, and local regulations and standards.
- Develop, implement, and monitor the IIPP.
- Assist departments in complying with the IIPP requirements including safety meetings, training and reporting programs, audits, and record keeping.
- Maintain all environmental monitoring records.
- Maintain employee medical and exposure records.
- Provide access to records in accordance with Title 8.

6.2 Supervisors/Managers (Administrators, Department Chairs, Program Coordinators/Directors)

- Ensure that direct reports and department employees implement the IIPP and associated programs and practices required to meet all applicable regulatory requirements.
- Maintain a safe and healthy workplace.
- Conduct safety inspections.
- Ensure compliance with Cal/OSHA and other applicable federal, state, and local safety, health standards and regulations.
- Develop local procedures to ensure effective compliance with the requirements of the IIPP - the major requirements are summarized in section 7.0.
- Provide employees (prior to, or at the time of their initial assignment), with information and training regarding identified workplace hazards, and whenever a new potential hazard or assignment is introduced into the workplace. Note: Training should be communicated in a language readily understood by the employee(s).
- Inform outside contractors who work in areas under the department/program's jurisdiction of the hazards to which contractor employees may be exposed.
- Encourage employees (without fear of reprisal), to inform their supervisors of workplace hazards.
- Ensure that employees participate in ongoing safety training.
- Monitor ongoing performance and participation as required in the IIPP through the performance appraisal process as identified in the faculty/employee handbook.

6.3 Employees

- Responsible for adhering to safe and healthy work practices.
- Responsible for following all of the procedures and guidelines established in the IIPP.
- Responsible for immediately reporting any unsafe conditions to his/her supervisor.
- Actively participate in safety/ health training and other related activities.

6.4 Contractors

- Must have their own IIPP that must complement Whittier College's IIPP.

- Must meet all regulatory requirements and actively participate in site health and safety activities as required in College agreements, contracts, and/or purchase orders.

7.0 Compliance

The major requirements of the Whittier College IIPP can be grouped into the following areas:

7.1 Training Programs - Described in Section 12.0

7.2 Safety Meetings - Described in the following Appendices:

Appendix B: Department Safety Meetings

Appendix C: Department Head Safety Meetings

Appendix D: Environmental Health & Safety Committee

7.3 Safety Audits - Described in the following Appendix:

Appendix A: Safety Audits

7.4 Other State Health and Safety Programs - Described in the following Appendices:

Appendix E: Hazard Communication Program

Appendix F: Chemical Hygiene Plan

Compliance will be among the items covered during the annual safety audits (Appendix A). Safety audits will include records evaluation for compliance with IIPP requirements (section 7.0) Additionally, the audits will include an employee questionnaire regarding IIPP procedural adherence and compliance.

Employees found violating workplace safety practices or found jeopardizing the safety of others shall be subject to disciplinary action in accordance with existing Whittier College policies and administrative regulations. Violations of management directives, College IIPP rules, regulations, work practices, or policies will result in disciplinary action. Any action taken will not violate employee rights under Cal/OSHA regulations and will be enforced in a non-discriminatory manner.

8.0 Communication of Health and Safety Issues

Throughout Whittier College's occupational safety programs, employees, supervisors, managers, students, contractors, and consultants are encouraged to openly and freely discuss safety, health concerns and other related issues.

Supervisors/Managers are responsible for communicating with employees about occupational safety and health issues in a form readily understandable by the employees they oversee.

Whittier College's communication system includes:

- New employee orientation including a discussion regarding safety and health policies/ procedures.
- Review of the College IIPP.
- Safety training programs.
- Regularly scheduled safety meetings.
- Posted or distributed safety information.
- A system for employees to anonymously inform management about workplace hazards.
- The Environmental Health & Safety Committee.

The Environmental Health & Safety Committee will ensure that the following objectives are achieved:

- The committee meets regularly, but not less than quarterly.
- Minutes or written records are prepared for each meeting, documenting the safety and health issues discussed. The records shall be made available to all affected employees through the use of postings, newsletters, or other appropriate written communication. Records of the meetings will be kept on file with the IIPP Administrator for at least three (3) years.
- Review of reports of safety inspections, investigations of occupational accidents, including causes for any incident resulting in injury, illness, or exposure to hazardous substances. Where necessary or appropriate, the committee will submit suggestions to management for the prevention of future incidents.

9.0 Identifying, Evaluating and Preventing Occupational Safety and Health Hazards

Whittier College has a variety of systems and programs in place to identify, evaluate and prevent occupational safety and health hazards.

The IIPP Administrator's responsibilities include but are not limited to the following:

- Developing, implementing, and monitoring the effectiveness of College safety and health programs.
- Reviewing applicable general industry safety orders and other safety orders that apply to the College's program and facility operations. Auditing the health and safety program described in Appendix A.
- Investigating occupational accidents, injuries, illnesses, and hazardous events that have occurred at Whittier College.
- Addressing concerns raised by employees during safety meetings.
- Addressing concerns reported to the Human Resources office (including anonymous reports).

Workplace Inspections. Supervisors/Managers shall ensure that departmental health and safety inspections are conducted regularly.

Inspections will be scheduled and will be conducted using the following criteria:

- An initial inspection when a program is first established.
- An inspection whenever new substances, processes, procedures, or equipment are introduced to the workplace which may present a new occupational safety and/or health hazard.
- An inspection of affected areas whenever the management is made aware of a new or previously unrecognized hazard.
- When occupational illnesses and injuries occur.

These inspections will be conducted with the following considerations:

- Management personnel conducting inspections will be designated by the IIPP Administrator in conjunction with departmental managers/supervisors.
- Inspections may be accomplished using check-off forms or other methods of documentation.
- Copies of the completed check-off forms or other documents will be distributed to the following College personnel when applicable:
 - IIPP Administrator
 - Environmental Health & Safety Committee
 - Supervisors/Managers

- Department Chairs

Safety Activities. Job Safety Analysis (JSA), employee safety training, or issue-specific assessments (e.g., department ergonomic studies) may be used in lieu of or to supplement the workplace inspections.

10.0 Accident Investigations

Accident investigations can be conducted to identify and correct unsafe conditions and practices. These investigations will be conducted for all work-related injuries and illnesses resulting in employees being unable to work. Accident Investigations will consist of the following:

- Injured workers and witnesses will be interviewed.
- Workplace will be examined for hazards associated with the accident/exposure.
- The cause of the accident/exposure will be determined.
- Corrective action will be determined and taken to prevent the accident/exposure from reoccurring.
- Documentation of the findings as well as actions taken to address/alleviate the safety hazard..

11.0 Timely Correction of Unsafe or Unhealthy Conditions and Work Practices

Unsafe or unhealthy work conditions, practices and procedures shall be corrected in a timely manner based on the severity of the hazard. Hazards shall be corrected according to the following practices:

- When observed or discovered; and
- When an imminent hazard exists which cannot be immediately abated without endangering employee(s) and/or property, assigned personnel will remove all exposed employees from the area except those necessary to correct the existing condition. Employees who are required to correct the hazardous condition shall be provided protection gear/equipment.
- Unsafe conditions that require repair work (i.e. uneven walking surfaces) shall be reported to the Director of Facilities. Repair requests that involve imminent safety hazards will be given top priority.

12.0 Employee Health and Safety Training Program

Whittier College's health and safety training program is intended to provide College employees with general safety and health information, and to inform employees of hazards specific or unique to their position.

The IIPP Administrator shall ensure that all Managers/ Supervisors are aware of the safety and health hazards that may be located in their departments.

The types of safety training and how it can be completed are as follows:

12.1 Injury and Illness Prevention Program (IIPP) Training

All employees, consultants, contractors and their representatives, are required to complete IIPP (general safety) training prior to starting their assigned job. This training can be accomplished via any of the following:

- Completing work-specific training in relation to safety issues in their areas.
- Completing the "New Employee Orientation" program. This orientation is organized by Human Resources and includes general safety training.

Training and instruction is provided:

- When the IIPP is established/updated.
- To all new employees.
- To all employees given new job assignments for which training has not been provided previously.
- Whenever new substances, processes, procedures and/or equipment are introduced to the workplace and represent a new hazard.
- Whenever Whittier College is made aware of a new or previously unrecognized hazard.
- To Managers/Supervisors to familiarize them with the safety and health hazards to which employees under their immediate supervision may be exposed.
- To all employees with respect to potential hazards specific to each employee's job assignment.

Employees who attend mandatory IIPP training will be expected to sign attendance sheets and actively participate in the training program.

12.2 Safe Work Practices When Using Hazardous Materials

Individuals who work with hazardous materials must complete HAZCOM (Appendix F) training.

12.3 Safe Work Practices When Using Machinery and Equipment

Employees who use hazardous machinery/ equipment in the course of their assigned position, must receive training on the safe use of the machinery/equipment prior to beginning their assigned position. Examples of the equipment covered by this section include, but are not limited to, forklifts, power tools such as saws, drills, jackhammers, aerial lifts, heavy equipment (e.g. backhoe or tractor), analytical equipment, industrial furnaces, and autoclaves.

The completion of a training course must be documented and shall include the following:

- Review of equipment operating procedures.
- Review of all potential hazards and the corresponding protective measures.
- Name of the qualified trainer.
- The length of time employee will be supervised during initial operation.

Any training provided by equipment manufacturers and representatives is acceptable provided it addresses all of the safety concerns.

12.4 Specific Hazardous Situations

Confined space entries, trenching, live electrical work, etc., are all specific hazardous situations. Managers/Supervisors are responsible for ensuring that safe work practices are followed regarding any potentially hazardous work situation.

Managers/Supervisors are responsible for ensuring that employees receive the necessary training to perform his/her job safely.

Dates, times, and course overviews for specific health and safety training sessions can be obtained by contacting the Human Resources department.

12.5 Hazardous Substances

Formal training must be provided regarding the use/storage/disposal of new substances. Training is provided on a one-on-one basis, between the employee and supervisor. The experienced user must obtain and review the SDS for pertinent safety information. New users of hazardous materials must first complete the training outlined in section 12.2 (Safe Work Practices for Using Hazardous Materials).

12.6 Processes

The term "process" applies to the production of a product. Since hazardous materials at Whittier College are not used to produce a material product, Whittier College is not considered to conduct processes, nor in any way does Whittier College simulate production processes.

12.7 Procedures

It is the responsibility of Whittier College to provide general safety programs for the campus community. The individual departments and programs, with assistance from Human Resources, must customize these programs to meet their individual department needs. The Director of Human Resources, the Chemical Hygiene Officer and the Environmental Health & Safety Committee will assist with implementation of these safety programs. The Human Resources department also provides safety training on an ongoing basis. Annually, departments and programs are audited by EH&S for safety compliance.

12.8 New Equipment

Supervisors/Managers are responsible for ensuring that the users of any new "hazardous equipment" have been appropriately trained.

Safety audits will be conducted to assess the effectiveness and thoroughness of such training. The criteria for evaluating the effectiveness of this training is based on:

- Documentation that training has been given;
- Identified injuries associated with the use of the equipment; and

- Interviews held with the equipment user to assess operational skill and personal knowledge of the applicable safety precautions.

13.0 Record Keeping and Record Access

Record keeping requirements of Title 8 CCR (d) are addressed in this section.

13.1 Records listed below are required by Cal/OSHA and will be maintained for the following periods:

- Employee exposure records, 30 years.
- Employee medical records, 30 years.
- Environmental monitoring records, 30 years.
- Safety training, safety meetings, safety audits, etc, 3 years

13.2 Records required by Cal/OSHA will be maintained as follows:

The Human Resources Department will maintain environmental monitoring records, and employee exposure and medical records.

Supervisors/Managers will maintain records of safety training, safety meetings, safety audits, etc. Original documents or copies of the original documents must be maintained to meet the requirements of this section. Also, copies must be sent to the Human Resources department. Other methods of record keeping or tracking, such as computer databases, may be used only as supplements to the recordkeeping requirement listed herein.

13.3 The hazard assessments; health and safety inspections; and accident investigation records will identify the person conducting the inspection/activity; any unsafe conditions; or practices identified; and the corrective action(s) taken to eliminate or control the hazard.

Health and safety training records shall include the name of the employees trained; date and type of training provided; the training title; and the name of the trainer.

13.4 An employee's records will be made available upon request to the employee; the employee's authorized representatives; and to the appropriate regulatory agencies.

- 13.5** Information considered to be pertinent to an employee's exposure (to toxic substances or harmful physical agents) record are:
- Any documentation of workplace monitoring or measurement.
 - Safety Data Sheets (SDS) or if these are not available, any other information that reveals the identity of a toxic substance or harmful physical agent.
- 13.6** Information considered pertinent to an employee's medical record made or maintained by a physician, nurse, or other health care professional, and released by the employee are as follows:
- Medical and employment questionnaire or histories.
 - Results of medical examinations and laboratory and other diagnostic tests.
 - Medical opinions, diagnoses, progress notes, and recommendations.
 - Descriptions of treatments, first aid, and prescriptions.
 - Employee medical complaints.
- 13.7** The IIP Program Administrator will ensure a copy of the Injury & Illness Prevention Program (IIPP) is available upon request to:
- Employees;
 - Employee's designated representatives; and
 - Appropriate regulatory agencies.

14.0 Plan Review

The IIP Program Administrator will be responsible for ensuring the IIPP is reviewed at least once during the first year after implementation and then again, at least annually thereafter.

The review will be to ensure that the written plan is appropriate for the Whittier College community at the time of the review and to assess any anticipated future safety changes. The IIP Program Administrator or designee will be required to provide written verification that the review was conducted, as well as provide written documentation of any changes, suggested modifications, and/or improvements.

APPENDIX A: SAFETY AUDITS

PURPOSE:

To evaluate department operations for compliance with applicable federal, state, and local safety and environmental regulations.

FREQUENCY:

Periodic. Frequency based on the hazards and degree of risk.

AUDITORS:

IIPP Administrator, Supervisors/Managers, Environmental Health and Safety Committee, Campus Safety

AREAS COVERED/AUDITED:

- Policy and Administrative Control
- General Housekeeping
- Respiratory Protection
- Hearing Protection Selection
- Personal Protective Equipment
- Equipment Lockout & Tagging
- Safety Showers/Eyewash Stations
- Hazardous Waste Storage
- Microwave Oven Monitoring
- Welding Operations
- Food Safety/Sanitation
- Fire/Life Safety
- Accident/Injury Reporting
- Access Platforms
- Confined Space Entry
- Compressed Gas Cylinders
- Contractor General Safety Rules & Regulations
- Heavy Equipment
- Department Emergency Procedures
- New Employee Training
- Local Exhaust Ventilation
- Compliance with Hazard Communication Program, Chemical Hygiene Plan, and IIPP.
- Chemical/Hazardous Waste Management
- Biological/Infectious Waste Management
- Radioactive Materials Management

DOCUMENTATION:

An audit report will be issued that notes compliance; lists any deficiencies found; addresses potential hazards; as well as suggested corrective action(s).

FOLLOW-UP:

All corrective actions taken should be documented and filed with the audit report.

APPENDIX B: DEPARTMENTAL SAFETY MEETINGS

PURPOSE:

- To provide safety training on new procedures and equipment.
- To discuss the safety issues related to a current project.
- To provide employees with a regular forum for reporting and discussing safety concerns.

FREQUENCY:

Monthly departmental meetings.

PARTICIPANTS:

All employees.

PRESENTERS:

Generally, first and second line supervision will facilitate/coordinate this meeting. However, all employees are encouraged to present topics and participate in the presentations/discussions. Guest presenters from various safety organizations are encouraged to facilitate a meeting.

TOPICS:

Suggested topics include, but are not limited to:

- Past Performance and Current Safety Goals
- Office Safety
- Emergency Procedures
- Lifting Injuries and Back Injury Prevention
- Hazard Communication Program training
- Proper Handling of Hazardous Materials/Waste
- Personal Protective Equipment
- Vehicle/Cart Safety
- Confined Space Entry
- Fire Prevention
- Chemical Hazards
- Respiratory Protection
- Machine Guarding
- CPR
- Bomb Threats
- Active Shooter Training

DOCUMENTATION/FOLLOW-UP:

All department safety meetings must be documented. Documentation must include the following:

- The safety training topic;
- The date of the training session;
- The name of the presenter; and
- A list of the employees in attendance.

APPENDIX C: DEPARTMENT HEAD SAFETY MEETINGS

PURPOSE:

- To provide a forum for departmental management to discuss safety and health-related issues and new program implementation.
- To facilitate resolution to safety-related concerns.
- To provide a means of evaluating the safety-related performance of supervisors and their managers.
- To provide a forum for the Environmental Health & Safety Committee to voice suggestions and concerns to supervisors/managers, that relate to health and safety.

FREQUENCY:

Semiannually.

PARTICIPANTS:

- Administrators;
- Deans;
- Directors;
- Division Chairs;
- Program Directors/Coordinators;
- Managers;
- Guests from related departments are also encouraged to participate.

TOPICS: Topics should include, but are not limited to:

- Department and campus emergency procedures.
- Injury /accident experience (OSHA-reportable and minor injuries).
- Results of various safety audits (observations, severity).
- Safety-related projects (completed, outstanding, in progress).
- Preventative/corrective actions.
- Items of interest from the Environmental Health and Safety Committee meetings.

DOCUMENTATION/FOLLOW-UP:

- Documentation should include the following:
- Verification of meeting/training, including a list of attendees;
- Any suggestions, recommendations, and complaints. These must be recorded and reviewed at each subsequent meeting until all issues are resolved.

APPENDIX D: ENVIRONMENTAL HEALTH & SAFETY COMMITTEE

PURPOSE:

- To provide a forum for all members of the campus community to discuss issues that impact campus safety.
- To provide a forum for the campus community to voice suggestions to senior management, regarding concerns, and recommendations, related to employee health/safety.
- To provide the necessary documentation for follow-up and correction of safety-related issues.
- To review and evaluate the effectiveness of campus safety programs and provide an avenue for employees to make recommendations for improvement.

FREQUENCY:

Quarterly.

PARTICIPANTS:

All scheduled meetings are announced prior to the meeting and open to the entire campus community.

Permanent members of the Environmental Health and Safety Committee include representatives from the following groups/departments:

- Athletics
- Bon Appetit
- Broadoaks
- Campus Safety
- Chemical Hygiene Officer
- Communications
- Counseling
- Disability Services
- Facilities
- Faculty Representative
- Finance and Administration
- Health
- Human Resources
- IT Services
- Library
- Performing Arts Center
- Student Life
- Student Representative

TOPICS:

Discussions are driven by issues and concerns raised during the Environmental Health and Safety Committee meeting.

DOCUMENTATION/FOLLOW-UP:

Items are documented for tracking purposes and their status reviewed at each meeting until completed. Copies of the minutes are maintained in the Human Resources Office.

APPENDIX E: HAZARD COMMUNICATION PROGRAM

See HAZCOM Program

APPENDIX F: CHEMICAL HYGIENE PLAN

See Chemical Hygiene Plan