

# Injury and Illness Prevention Program (IIPP)

Maintained by: Office of Environmental Health and Safety University of San Francisco

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#### 1) Introduction

The University of San Francisco (USF) Injury and Illness Prevention Program (IIPP) describes the workplace safety, authority, and responsibilities of all USF campus employees. It addresses workplace safety, compliance, hazard identification, incident reporting and investigation, hazard mitigation, training, employee communication, program documentation, and recordkeeping. The IIPP complies with the Cal/OSHA California Code of Regulations <u>Title 8, Section 3203</u> to provide a safe and healthful workplace for all campus employees.

#### a) Scope

This program applies to all USF campus employees, contractors, and visitors.

# 2) Roles and Responsibilities

#### a) USF Vice President of Business and Finance

The Vice President of Business and Finance has the authority and ultimate responsibility for the effective implementation of the USF IIPP at all campuses under USF's control.

Responsibilities include:

- Demonstrating interest in safety issues to ensure other community members address safety issues.
- Demonstrating support and providing funding for workplace safety programs and safety equipment.
- Demonstrating that while safety is everyone's duty, it is a function of management to provide for resources and guidance to ensure a safe working environment.

#### b) President, Provost, Vice Presidents, Associate/Assistant Vice Presidents, Deans, and Department Heads

The President, Provost, Vice Presidents, Associate/Assistant Vice Presidents, Deans, and Department Heads are responsible and accountable for establishing, enacting, maintaining, and enforcing this IIPP within their areas of supervision.

#### c) Office of Environmental Health and Safety (EH&S) - EH&S Manager

As designated by the VP of Business & Finance, the individual with responsibility for oversight and maintenance of the written IIPP is the EH&S Manager.

The Office of Environmental, Health and Safety (EH&S) monitors IIPP implementation, with certain duties falling on all supervisors as outlined in this document.

#### Responsibilities include

- Overall oversight of campus workplace health and safety programs and policies.
- Liaison with oversight committees and regulatory agencies.
- Identification of hazards and implementation of preventive measures.
- Inform the campus community and leaders of applicable health and safety requirements.
- Conducting periodic, routine workplace inspections of hazardous material locations with campus partners
- Facilitate, empower, and encourage employee participation in the workplace safety program.
- Coordinating responses to employee occupational health and safety-related concerns.
- Communicating workplace safety information.
- Encouraging employees to <u>report</u> potential safety issues anonymously.
- Participate in a quarterly review of work-related injuries, illnesses, and near misses for root cause analysis in collaboration with Risk Management, and Human Resources.
- Maintaining a master electronic file of <u>Safety Data Sheets (SDS)</u>. (If accessing from outside USF, make sure to use a VPN connection)

- Providing access to an online suite of EH&S safety training which includes storage of safety training records. Contact EH&S to review this library of training options. Both online and in-person training is to be documented and records sent to the EH&S office for recordkeeping.
- Maintaining inspection records in collaboration with other campus partners (e.g. radiation safety, biological safety, fire and life safety, physical safety, asbestos control, chemical laboratory safety, etc.).
   EH&S also maintains records of particular hazard inspections and environmental measurements performed by EH&S.

#### d) Health and Safety Committee

USF has established an overarching Health and Safety Committee co-chaired by the Director of Risk Management and the EH&S Manager. The goals are to promote a safe and healthful workplace via employee involvement throughout the campus community, to facilitate prompt correction of identified hazards from inspections or accident reviews, to facilitate review of University Health and Safety Programs, and to ensure recommendations are addressed by University management.

The H&S Committee is composed of individuals who represent the major departments with regard to health and safety issues. Represented departments include Human Resources, Public Safety, Resiliency, Laboratory Safety, Health Promotions, Housing, Facilities Management, Athletics, Koret Health & Recreation Center, etc. This committee meets monthly, with the exception of the summer months, and reviews a wide range of issues related to the health and safety of the campus. There is a monthly agenda as well as minutes which are available upon request.

### e) Supervisors: The Key to Ensuring Safety and Compliance

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

- Encouraging a safe work culture by modeling and enforcing safe work practices;
- Completing periodic (quarterly as best practice, semi-annual at a minimum), inspections of workspace under their direction;
- Stopping work that poses an imminent hazard;
- Implementing measures to eliminate or control workplace hazards;
- Developing safe work procedures such as standard operating procedures (<u>SOPs</u>) and <u>Job Safety Analysis</u> (<u>JSAs</u>). See also <u>Job Safety Analysis Example Forklift USF EH&S</u>. Contact EH&S for guidance.
- Providing appropriate safety training and personal protective equipment to employees under their supervision;
- Documenting employee training and departmental safety activities;
- Reporting work-related injuries and illnesses via the <u>Injury and Illness Incident Report</u> form within 24 hours and to <u>leaves@usfca.edu</u>
- Encouraging employees to report health and safety issues without fear of reprisal;
- Document and partner with HR/Labor Relations about employees who do not comply with safe work practices; and
- Communicating all health and safety issues.

#### f) Employees

The success of USF's IIPP depends on the actions of all employees. All employees are responsible for:

- Performing assigned job functions in a safe and healthful manner, according to established procedures.
- Completing all required general and site-specific training.
- Reviewing and adhering to all safety information provided by EH&S and their supervisors.
- Reviewing ergonomics education information.
- Reporting all unsafe conditions, practices, or equipment to their supervisor or <u>EH&S</u> as soon as possible. All employees are encouraged to report safety concerns to their direct supervisor and/or EH&S.
- Reporting all <u>work-related injuries and illnesses</u> promptly to a supervisor and completing required forms within 24 hours
- Signing up for DonsAlert, USF's alerting and warning service. USF Alerts

# 3) Employee Rights

Any member of the USF community who identifies work that may present an imminent hazard to people or the environment has the authority to call for that work to cease immediately, via notification of the appropriate supervisor, Public Safety, Facilities, and EH&S. Work may resume only when all involved parties agree that safe conditions have been established. In the event that a consensus cannot be reached on safety regarding the task at hand, EH&S will determine the appropriate control measures.

In addition to the responsibilities outlined above, employees have the right to:

- A safe workplace.
- Raise a safety or health concern with their supervisor, EH&S, or Cal/OSHA, or report a work-related injury or illness, without fear of reprisal.
- Receive information and training on job hazards, including all potentially hazardous substances in the workplace.
- Request copies of applicable medical records (for self) through the provider they received care from and any workplace exposure monitoring data

# 4) New Employees

Supervisors must ensure all new employees receive training on applicable safety and health policies and procedures.

# 5) Identification and Evaluation of Workplace Hazards

EH&S has procedures for identifying and evaluating workplace hazards, unsafe conditions, and unsafe work practices. Supervisors should do self-audits in a manner and as often as circumstances demand (ask EH&S if unsure). See the IIPP General Office Inspection Checklist Form.

# a) Workplace Inspections

EH&S conducts periodic inspections of all areas with hazardous materials to identify and correct existing or potential hazards in the workplace. Workplace hazards identified will be discussed with, and corrected by, supervisors and department heads with the goal of identifying a solution. Any workplace hazards identified that have not been addressed in a timely manner by the department head or supervisors will be brought to the appropriate VP/Dean for further corrective action as needed.

#### b) Investigation of Accidents and Occupational Injuries/Illnesses

Supervisors are expected to investigate all work-related injuries to determine cause(s) and prevent recurrence and submit the <u>Injury and Illness Reporting form</u> within 24 hours of the incident. In cases involving hazardous materials or agents, or special circumstances, EH&S will work with the supervisor to evaluate the hazard and establish needed corrections.

# a) Correction of Workplace Hazards

Unsafe and unhealthy working conditions, practices, or procedures will be corrected in a timely manner based on the severity of the hazards. Generally, supervisors and/or department heads are responsible for the identification and correction of hazards their employees face and should ensure that work areas they exercise control over are inspected at least annually. Supervisors and/or department heads should check for safe work practices with each visit to the workplace and should provide immediate verbal feedback where hazards are observed. Supervisors of affected employees are expected to correct unsafe conditions as quickly as possible after discovery of the hazard

EH&S is responsible for performing a variety of hazard audits. These include hazard evaluations, facility or worksite inspections, accident investigations and exposure monitoring. The EH&S office can inspect the workplace to assess any potential associated hazards and work with the supervisor to determine what controls are needed to mitigate those hazards. The supervisor or department head is responsible for implementing the necessary controls recommended by EH&S.

#### b) Imminent Hazard

If an imminent hazard exists, work in the area must cease, and the appropriate supervisor must be contacted immediately. If the hazard cannot be immediately corrected without endangering employees or property, all employees are to be removed from the area except those qualified and necessary to correct the condition. Work may resume only when all involved parties agree that safe conditions have been established. In the event that consensus cannot be reached on safety regarding the task at hand, EH&S Safety Manager will determine the appropriate control measures.

# c) Safe Operating Procedures (SOPs)

SOPs are written documents that clearly outline the steps to be followed when carrying out a given operation so that a process can be replicated in a safe manner by any person reading the SOP. SOPs convey operational procedures, process information, safe working conditions, practices, and protective/safety equipment needed to eliminate or mitigate identified safety and health hazards. Supervisors are to ensure that SOPs are available for all potentially hazardous operations, and a copy of these SOPs are filed with the EH&S Office. A number of widely-applicable SOPs is found on the EH&S website.

#### 6) Reporting and Investigation of Workplace Hazards

#### a. Employee Reporting Procedures

If you have been injured on the job:

- Inform your supervisor and seek medical attention immediately. If an emergency, call 2911 or (415) 422-2911 if on campus or 911.
- Review the <u>worker's compensation protocols</u> provided on the Human Resources website for medical care information and required forms.

# b. Supervisor Responsibilities

If you are a supervisor of an injured employee:

- Ensure that the employee gets appropriate medical care. If an emergency, call 2911 or (415) 422-2911 if on campus or call 911 if off campus.
- Notify EH&S, HR, and Public Safety immediately of any serious injury and/or hazardous material exposure.
  - EH&S (415) 422-5884 during business hours
  - o Public Safety Dispatch (415) 422-4201 during all hours
  - o Human Resources (415) 422-6707 during business hours and to leaves@usfca.edu
- Review worker's compensation information on the Human Resources website for supervisors.
- Complete an <u>Injury and Illness Incident Report</u> within 24 hours.

In Addition: If any employee requires hospitalization or a death occurs, HR's Director of Benefits should be notified to report the incident to:

CalOSHA- San Francisco (415) 557-0100 or <a href="mailto:caloshaaccidentreport@tel-us.com">caloshaaccidentreport@tel-us.com</a>

#### Campus Emergency Resources

- Police, Fire, Medical Emergency, Haz-Mat Spills
  - From campus phone: 9-911 (SF Emergency Response) or 2911 (Public Safety)
  - From cell phone: (415) 422-4201 Public Safety Dispatch
- Poison Control: 1-800-222-1222
- DonsAlert: USF's alerting and warning service. It is activated to contact you when there is an immediate
  threat to safety or health affecting the campus community. Alerts are sent by phone, text message, or
  email. Sign Up for Emergency Notifications: <u>USF Alerts</u>

<u>Emergency Operations Plan</u> (EOP): All campus departments and their affiliated sites are encouraged
to prepare an Emergency Operations Plan (EOP) in consultation with Public Safety. This plan outlines
your department's preparedness measures and priority actions for managing emergencies, from small
accidents to citywide disasters

# 7) Communicating Workplace Hazards

EH&S uses the following methods listed below to ensure effective safety communication. EH&S provides support and resources to the campus community to meet training and information requirements.

Forms of USF communications on health and safety topics include (examples; not an exhaustive list):

#### Resources

- i. Chemical Hygiene Plan
- ii. Hazard Communication program
- iii. Fire Plans
- iv. **Emergency Action Plans**
- v. Personal Protective Equipment
- vi. Laboratory Safety Orientation

#### Safety Manuals

- i. Biosafety Manual
- ii. Radiation Safety Manual
- iii. Controlled Substances Program Manual
- iv. Respiratory Protection Manual
- v. Fire Protection Program Manual
- vi. Bloodborne Pathogens Manual

#### EH&S Safety Consultation

Safety Committee Meetings

Safety Data Sheets (SDS)

Posters and Signs

Warning Labels

# New Employee Safety Orientation

# 8) Training and Documentation

Most safety trainings are through the EH&S web-based training software.

Supervisors are responsible for obtaining training to familiarize themselves with the safety and health hazards to which employees under their immediate direction and control may be exposed. This training is provided online through the online training offered by EH&S.

New employees are trained in general safe work practices and campus policy and procedures through online training or by qualified individuals from EH&S or consultants. Job-specific hazard training is provided by their departments.

All employees given new job assignments are to be provided appropriate training by qualified individuals from the affected departments and/or EH&S prior to the employee beginning the new work. A qualified individual is someone with education, experience and/or first hand knowledge of the subject matter.

Whenever new substances, processes, procedures or equipment (that represent a new hazard) are introduced to the workplace, affected employees will be trained by qualified individuals from their department and/or EH&S.

EH&S is available to assist with the development and review of new departmental safety programs. In addition, EH&S should be contacted to review existing departmental safety programs. EH&S and other campus partners may be contacted to conduct training or to provide training materials.

Training may include, but is not limited to, the following topics:

- 1. Injury and Illness Prevention Program
- 2. Hazard Communication
- 3. Emergency Action Plan
- 4. Fire Safety
- 5. Equipment Operation
- 6. Radiation Safety
- 7. Biological Safety
- 8. Chemical Safety
- 9. Physical Safety
- 10. Hazardous Waste Materials Handling and Disposal (Chem., Rad., Bio., E-Waste, Universal Waste)

A database of training records is maintained by the EH&S Office. Both online and in-person training is to be documented and forwarded to the EH&S Office for recordkeeping.

# 9) References and Supporting Information

- Hazard Report/ Safety Suggestion
- EH&S Hazard Investigation Report