

Injury and Illness Prevention Program

University of San Francisco

**Environmental Safety Office
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I. INTRODUCTION

In October of 1989 California legislature enacted Senate Bill 198, which called for every California employer, regardless of size, to implement a detailed written Injury and Illness Prevention Program. Cal-OSHA, the regulatory body, published their requirements for this law in Title 8, California Code of Regulations Section 3203. The regulations specify that the program be operative and effective and should include, but not be limited to, the following elements:

1. Designation of the individuals responsible for implementing and administering the program.
2. The employer's system for identifying and evaluating workplace hazards, including scheduled periodic inspections to identify unsafe conditions and work practices.
3. The employer's methods and procedures for correcting unsafe or unhealthy conditions and work practices in a timely manner.
4. An occupational health and safety training program designed to instruct staff and faculty in general safe and healthy work practices and to provide detailed instructions with respect to hazards specific to each staff and faculty member's job assignment.
5. The University's system for communicating with staff and faculty on occupational health and safety matters, including provisions designed to encourage staff and faculty to inform the University of hazards at the workplace without fear of reprisal.
6. The University's system for ensuring that staff and faculty comply with safe and healthy work practices, which may include disciplinary action.
7. Investigation of accidents which involve University staff and faculty members during working hours whether on or off campus.

The University's Injury and Illness Prevention Program exceeds the above requirements and will be revised periodically to comply with changes in the law and to maintain a safe and healthy workplace for all members of the University community.

II. UNIVERSITY'S COMMITMENT TO HEALTH AND SAFETY

A. Objectives of the Injury and Illness Prevention Program

The University's Injury and Illness Prevention Program is designed to prevent injuries and accidents in the workplace and to ensure the health and safety of staff and faculty. The law states that all California employers must have an Injury and Illness Prevention Program. The University will ensure that the program be provided in a language that is understandable to all staff and faculty within the requirements of the law.

B. Health and Safety Policy

The University is firmly committed to maintaining a safe and healthy environment. To achieve this goal, the University has implemented its health and safety policy as outlined in this comprehensive Injury and Illness Prevention Program. The program is designed to prevent workplace accidents, injuries, and illness. A copy of the program is maintained in every University department and available for reference during work hours.

C. Safety Rules

The University's Safety Rules are a key part of our Injury and Illness Prevention Program. All staff and faculty are required to abide by these rules, which are to be enforced by supervisory and management personnel.

1. All injuries must be reported to a Supervisor immediately.
2. All hazardous conditions must be reported to a Supervisor immediately.
3. Staff and faculty must follow Safe-Job Procedures outlined in the Job Safety Handbook at all times.
4. Approval of a Supervisor is required before any staff or faculty member may make any changes in established Safe Job Procedures.
5. Direction from a Supervisor is required before any staff or faculty member proceeds with any hazardous job or operating any machine about which he/she is unsure.
6. Safety guards on machines must not be removed - they are there for the protection of staff and faculty!
7. Personal Protection Equipment (PPE), such as goggles, earmuffs, and respirators, must be worn when appropriate.
8. Do not use defective or inappropriate tools or equipment.
9. Do not lift items which are too bulky, awkward, or heavy without assistance.
10. Do not perform any repetitive task that causes you physical discomfort.
11. The Use of alcohol and recreational drugs is prohibited in the workplace. Certain drugs and medications, even non-prescription, such as those used for colds, might impair your ability to do your job safely. You must inform your Supervisor when using drugs and other medications that could affect your physical and mental abilities. Your supervisor may request to see a doctor's prescription if such documentation is required.

D. Housekeeping Policy

Working in a well-organized area reduces the chance of accidents and injuries. A well-organized work area also increases job efficiency. Each staff and faculty member is responsible for keeping his or her work area neat and orderly. Poor housekeeping may be identified by the staff or faculty member's Supervisor or Program Monitor and documented during inspections.

III. RESPONSIBILITY FOR IMPLEMENTING THE PROGRAM

A. List of Program Officers

Program Administrator	Charlie Cross V.P., Business and Finance x6428
Safety Director	Martha Peugh-Wade Assistant VP Human Resources x6707
Environmental Safety Manager	Joseph E. Murphy Environmental Safety Manager x6464
Program Monitors	Listed in Appendix B

B. Program Administrator

The Program Administrator is responsible for the overall implementation and maintenance of the University's Injury and Illness Prevention Program. The Program Administrator's duties are to:

1. Ensure that Supervisors and Program Monitors are trained and able to train other staff and faculty members in accordance with this program.
2. Ensure that all staff and faculty members are trained in accordance with this program and are familiar with the safety and health hazards associated with their jobs, as well as applicable laws, regulations and the University's Safety Rules.
3. Ensure that workplace conditions are routinely evaluated for hazards.
4. Ensure that workplace hazards are remediated in a timely and effective manner. The Program Administrator may assign all or some of these tasks to other individuals within the University. Nevertheless, the Program Administrator is ultimately responsible for the program's implementation and maintenance.

C. Safety Director

The Safety Director's duties are to:

1. Ensure that workplace hazards are promptly remediated.
2. Generate a program for the medical treatment of injured staff and faculty members that includes first-aid equipment, staff and faculty training, and procedures for providing additional medical care.
3. Investigate and maintain records of accidents and injuries that occur at the University and ensure that corrective action is completed.
4. Maintain a "Log of Occupational Injuries and Illness," which are to be recorded on Cal-OSHA Form 200.
5. Complete the "Employer's Report Of Injury (DSL5020)" form promptly after receiving notice of an accident or injury and forward a copy to the Division of Labor, Statistics and Research.
6. Maintain liaison with local and state agencies and the University's Health and Safety Committee, Risk Manager and insurance carriers.
7. Keep up-to-date information on local, state, and federal health and safety regulations.
8. Keep all levels of management informed of applicable health and safety laws and standards.

The Safety Director may assign all or some of these tasks to other individuals within the University. Nevertheless, the Program Administrator is ultimately responsible for the program's implementation and maintenance.

D. Environmental Safety Manager

The Environmental Safety Manager's duties are to:

1. Assist in coordinating the activities of all individuals involved with the University's Injury and Illness Prevention Program.
2. Help plan, organize, and coordinate health and safety training.
3. Update the Injury and Illness Prevention Program as necessary.
4. Receive and process reports of hazardous conditions.
5. Maintain centralized copies of all records of training, inspections, reports of hazardous conditions and other reports to assist in auditing compliance of the program.

The Environmental Safety Manager may assign all or some of these tasks to other individuals within the University. Nevertheless, the Program Administrator is ultimately responsible for the program's implementation and maintenance.

E. Program Monitors and Supervisors

A list of the University's Program Monitors can be found in Appendix B. With support and assistance from their Supervisors the Program Monitors' duties are to:

1. Organize and conduct **Initial Orientation Training** (Section VII) whereby new or untrained staff and faculty members receive a thorough introduction to the Injury and Illness Prevention Program in a language that is understandable to them. This orientation should include basic Emergency/Disaster information. Please refer to the Emergency Handbook, Appendix H, and the Disaster Plan, Appendix I. Document this training on the Initial Orientation Training Report (Appendix A). A copy will be maintained in the Program Monitors's IIPP binder and a copy will be sent to the Environmental Safety Manager.
2. Organize and conduct **Scheduled Periodic Training** (Section VII) whereby staff and faculty members receive training on the hazards of routine tasks, non-routine tasks, and those foreseeable in emergency situations (Appendix C, Job Safety Handbook). Conduct training again whenever a new workplace or process hazard is introduced. Document this training on the Scheduled Periodic and Hazard Specific Training Report (Appendix A). A copy will be maintained in the Program Monitors's IIPP binder and a copy will be sent to the Environmental Safety Manager.
3. Conduct or arrange **Hazard Specific Training** (Section VII) for those staff and faculty members who may be exposed to hazardous environments (Use Appendix C, Job Hazard Analysis, appendix E, Job Safety Handbook and any of the other appendices as appropriate). Document this training on the Scheduled Periodic and Hazard Specific Training Report (Appendix A). A copy will be maintained in the Program Monitors's IPP binder and a copy will be sent to the Environmental Safety Manager.
4. Organize and conduct **Scheduled Periodic Inspections** (Section VIII) and unscheduled inspections whereby equipment is checked to ensure that it is in safe operating condition. Document these inspections on the IPP Inspection Form that applies to your department (Appendix A). A copy will be maintained in the Program Monitors's IPP binder and a copy will be sent to the Environmental Safety Manager.
5. Ensure that staff and faculty members follow all of the University's Safety Rules and Safe Job Procedures (Appendix C, Job Safety Handbook), including the use of personal protection equipment (PPE) when appropriate.

6. Immediately report to the Safety Director any accident or hazardous condition which cannot be easily corrected. Alternately, every staff and faculty member can use the anonymous reporting procedures outlined in Section V Communication of Health and Safety Issues. If the hazard is dangerous to life and health, report it promptly to the Safety Director. Routine reports of workplace hazards will be sent to the Environmental Safety Manager.
7. Supervisor's who hire outside contractors must disclose known potential hazards to which the contractor's employees may be exposed. To avoid this liability it is best to arrange for such contractor work through Facilities Management.

F. Staff, Faculty and Other University Employees

Employees of the University, including faculty, staff, clerical and technical support, student employees and volunteers, have the responsibility to:

1. Use common sense and good judgment at all times to prevent unnecessary injuries on the job. Accident prevention is the responsibility of each and every staff and faculty member!
2. Read and comply with the policies outlined in the Injury and Illness Prevention Program and Safe Job Procedures outlined in the Job Safety Handbook.
3. Do not attempt to perform a task without adequate training or if it appears to be unsafe. Consult with a Supervisor.
4. Know the name of your department's Program Monitor and follow their instructions implicitly.
5. Report any hazard to your Supervisor or Program Monitor that is beyond your capacity to correct. Alternately, use the anonymous reporting procedures outlined in Section V Communication of Health and Safety Issues. The University will not find blame in any staff or faculty member who reports an unsafe condition.

G. Health and Safety Committee

The Health and Safety Committee will ensure that the University's Injury and Illness Prevention Program is operating effectively. The Health and Safety Committee is chaired by the Manager of Benefits and Compensation (Safety Director) and meets once each month. The committee is represented by the following positions;

Environmental Safety Manager
Director of Facilities Management
Director of Public Safety
Director of Koret Health and Recreation Center
Director of Residence Life
Director of Business Affairs, Arts & Sciences
Insurance Representatives from University Insurance Carriers
OPE Representative
Coordinator, Office of Student Affairs

The committee's responsibilities are to:

1. Perform quality control checks of Scheduled Periodic Inspections.
2. Review and analyze recurrent accidents or ones which involve serious injuries or illness.
3. Provide recommendations to departments on health and safety issues.
4. Serve as a conduit for communication between staff and faculty members and the University, investigating health and safety suggestions and any allegations of hazardous conditions.

H. On-Site Contractors

Contractors hired to work at the University shall be informed of site-specific hazards to which the contractor and his/her employees may be exposed while working. To avoid the liability involved in neglecting this, it is best to arrange all contractor work through Facilities Management. Written into the University's work agreements with on-site contractors will be:

1. A stipulation regarding the contractor's personal responsibility for their employees' health and safety;
2. A statement that the University is not responsible for the health and safety of its on-site contractors beyond providing site-specific hazard information;
3. A statement that contractors and subcontractors are responsible for administering health and safety training to their employees.
4. A statement that contractors and subcontractors are required to comply with all federal, state and local regulations regarding worker and environmental health and safety.

IV. ENFORCEMENT OF THE SAFETY RULES

A. Incentive Program

The University has developed an Incentive Program that provides a system for the "recognition of staff and faculty members who follow safe and healthful work practices." Safe work practices may be one of the criteria for evaluation in performance appraisals (as allowed by union contracts). In addition, the promoting of safe work practices may be considered as one of the aspects in the University's Merit Award Program.

B. Disciplinary Program

The law requires that the University have a "system for ensuring that staff and faculty members comply with safe and healthy work practices - which may include disciplinary action." To ensure staff and faculty compliance with the Injury and Illness Prevention Program, the University's disciplinary procedures will be followed.

The staff or faculty member's Supervisor is responsible for ensuring that the disciplinary policy is clearly communicated and uniformly enforced. When it is deemed necessary to take disciplinary action, the Supervisor (in accordance with the union rules for collective bargaining employees) will discipline the staff or faculty member in a manner appropriate for the safety infraction. Supervisors are encouraged to discuss the disciplinary practice with the Associate Vice President of Personnel Services or the Director of Labor Relations (for union employees).

V COMMUNICATION OF HEALTH AND SAFETY ISSUES

A. Open Lines of Communication

The law specifies that the Injury and Illness Prevention Program be "readily understandable" to all staff and faculty members. To accomplish this goal the University will provide staff and faculty members with a translated version of the program within the requirements of the law.

The University's Injury and Illness Prevention Program encourages communication between staff and faculty members and all levels of management on health and safety issues. It is the job of all Supervisors and Program Monitors to communicate to the staff and faculty that they are expected to abide by the University's Safety Rules and established Safe Job Practices (Appendix C, Job Safety Handbook). A staff or faculty member who identifies a hazardous condition anywhere at the University may report to:

1. The staff or faculty member's Supervisor, Program Monitor or other management personnel, who will promptly investigate and take corrective action.
2. The staff or faculty member's bargaining unit representative.
3. The Health and Safety Committee.
4. The **Hazardous Condition Report** may be filed *anonymously* (Appendix A). See section "C" below.

B. Safety Training

Every new or otherwise untrained University staff and faculty member must receive Injury & Illness Prevention Program Initial Orientation Training that introduces them to the University's Injury and Illness Prevention Program. The staff and faculty member's first Scheduled Periodic Training occurs directly after their Initial Orientation Training and gives the staff or faculty member safety training specific to their job assignment. Staff and faculty members may also be required to receive Hazard Specific Training if they work with hazardous materials or machinery or in a hazardous environment. The staff or faculty member's training continues throughout their employment with the University. This Scheduled Periodic Training must occur at the frequency listed in **Table 1, Frequency of Inspections and Scheduled Periodic Safety Training (See Section V, A, 2)**.

All safety training conducted at the University is documented and maintained on file in the Program Monitor's IPP binder. Copies of the forms documenting this training should be sent to the Environmental Safety Manager. The following forms document the University's safety training activities: Initial Orientation Training is documented on the **Initial Orientation Training Report**, and Scheduled Periodic Training and Hazard Specific Training are documented on the **Scheduled Periodic and Hazard Specific Training Report** (Appendix A).

C. Anonymous Notification Procedure

The University is committed to maintaining bi-directional communication of health and safety information between the University and staff and faculty. In this endeavor, the University has developed the **Hazardous Condition Report** (Appendix A), whereby a staff or faculty member may *anonymously* report any health or safety concern without fear of reprisal. The report gives the staff or faculty member the opportunity to report hazards or suggest safety improvements in the workplace. No staff or faculty member will be disciplined or discharged for reporting any workplace hazard or unsafe condition. The report is accessible to all staff and faculty members and can be easily and anonymously mailed to the Environmental Safety Manager. To assist in the free, easy and unobserved access of these forms they can be found in Appendix A of the IPP binder and they will be widely available throughout campus.

The Environmental Safety Manager is responsible for ensuring that allegations made in the reports are investigated and any unsafe conditions are corrected. Urgent items will be acted upon immediately. The allegations and action taken for serious or otherwise important issues may be reviewed at Health and Safety Committee meetings.

D. Safety News Articles

The Subcommittee On Workers Compensation Claims publishes a bimonthly "Health and Safety Reminder" article in USF News, the faculty and staff newspaper. These articles help to increase the staff and faculty awareness of health and safety services sponsored by the University, give warnings on frequent accidents, reminders of emergency life saving procedures, and provides tips on maintaining good health.

E. Health and Safety Committee and Program Monitors

The University's Health and Safety Committee provides a forum where Program Monitors and management can meet to discuss the Injury and Illness Prevention Program's implementation, injury statistics, progress or problems in various departments, and new ideas. Because there are too many Program Monitors for all to attend the meeting, a schedule will be developed to invite a smaller number of Program Monitors on a rotating basis each month. Committee meetings are held monthly and the topics discussed are documented in the meeting minutes, which are kept on file in the Safety Director's office.

F. Health and Safety Programs

The University offers a number of health and safety programs and employs a Wellness and Fitness Coordinator (Section VI). These programs will help to reduce the injuries, illness, and stress of staff and faculty members.

VI. HEALTH AND SAFETY DOCUMENTS

The University of San Francisco has in operation a number of safety plans, handbooks and programs, that in conjunction with the Injury and Illness Prevention Program, offer staff and faculty members a thorough perspective of the University's health and safety policies and guidelines. These safety documents, which are described below, are available to all staff and faculty members. Most can be found at the back of this document located by their appendix reference.

A. Job Hazard Analysis - Appendix C

The Job Hazard Analysis (JHA) is a required component of the IPP. The objective is to identify specific job activities, any potential hazards that might result from doing that task and then suggest a procedure that would minimize the hazard(s) thus making the job safer. The number of individual positions within the University is overwhelming and the job hazards associated with many positions are the same. As such we developed the Job Hazard Analysis based on job categories and defined the expected hazards and safe practice for that category. Some positions may have more than one JHA Category and these are listed along with the primary JHA Category. To assist in locating your job category we have provided a cross-index between position and the JHA Category. This cross-index is provided as Appendix D, Job Hazard Analysis Category Index.

B. Job Hazard Analysis Category Index - Appendix D

The JHA Category Index was designed to assist staff and faculty with locating the Job Hazard Analysis that best describes their job activities. The following is an example of how to use the index. If you held the position of "Director of Residence Life" you would look for "Director" under "Title." Once you have located "Director" you can determine the Job Hazard Analysis Category for your position. Referring back to the Job Hazard Analysis, Appendix C, you can find this category and review the hazards as well as the safe job practices.

C. Job Safety Handbook - Appendix E

The Job Safety Handbook provides all staff and faculty members with the University's established Safe Job Procedures for operating a range of equipment, such as video display terminals (VDTs), ladders, hand tools, and for various situations, such as working with hazardous substances and lifting heavy objects. *Every staff and faculty member is required to read the sections of this document that pertain to their particular work environment and be aware of the steps to properly and safely use their work equipment.*

D. Ergonomics Policy - Appendix F

Studies have shown that workplace design as well as the nature of certain job activities can lead to a host of maladies including headaches, muscle tension, eye strain as well as lasting injuries such as those associated with repetitive motion injuries (RMI). These types of work place injuries and their causes are collectively referred to as issues of Ergonomics and are regulated by the Occupational Safety and Health Administration (OSHA). The University offers programs designed to address campus needs surrounding this ongoing issue through the Wellness Program in the Human Resources Department.

E. Smoking Policy - Appendix G

While it has been well established that cigarette smoking causes cancer, a serious consequence for the smoker, more recent studies have shown that second hand smoke, the smoke which tails off of the burning cigarette as well as that exhaled by the smoker, causes cancer in non-smokers who passively inhale this smoke. This appendix contains the University's Smoking Policy that is in compliance with the City's ordinance but has gone further to ban smoking on campus (even in outdoor open areas) with the exception of two designated smoking areas.

F. Emergency Handbook - Appendix H

The Emergency Handbook is a training manual for staff and faculty members developed by Public Safety to assist the Program Monitors in preparing staff and faculty in their areas for emergency situations. In keeping with the concepts of injury and illness prevention, Program Monitors would educate those in their area on the basics of the University's disaster preparedness plans and procedures. Program Monitors would act as contacts to disseminate information before and during emergencies.

G. Disaster Plan - Appendix I

The Disaster Plan outlines measures to take in the event of a natural or other significant disaster that poses the threat of injuries or death to members of the community, large-scale damage to the physical structure of the University, or a significant disruption of the normal operations of the University. This document provides the framework by which the University can effectively manage such events to minimize loss of life and damage to University facilities.

H. Chemical Hygiene Plan - Appendix J

The Chemical Hygiene Plan provides University staff and faculty members who work with or around chemicals the procedures and policies for safely using hazardous substances in their work areas. The plan addresses staff and faculty training, the dissemination of information, medical consultation and examinations, hazard identification, respirator use, and record keeping.

I. Hazard Communication Plan - Appendix K

The Hazard Communication Plan was written to ensure that staff and faculty know the properties and potential hazards of materials with which they work, or to which they may otherwise be exposed, and to improve the detection and prevention of occupational illness and injuries. A sub-program required by the Chemical Hygiene Plan, the program provides staff and faculty with "Right-To-Know" information. It discusses information sources such as Safety Data Sheets (SDS) that provide detailed information about hazardous substances staff and faculty may work with or be exposed to on the job. Other topics such as safe handling of hazardous materials, labeling requirements and spill response procedures are reviewed. The program requires that the University provide this training on a regular basis.

J. Hazardous Spill Response Protocol - Appendix L

The Hazardous Spill Response Protocol provides detailed information to all staff and faculty who work with hazardous substances on the University's policy for responding to hazardous chemical spills. The protocol distinguishes between serious spills and non-serious spills and gives the procedures to follow with each. Also included is valuable information on choosing personal protective equipment when handling a chemical spill.

K. Bloodborne Pathogen Program - Appendix M

Exposure to blood and other potentially infectious materials is a serious concern for emergency response personnel, health care providers, recreational sports facilities and those in the medical and science fields who work with and on these materials.

OSHA has recognized this potential for exposure as a serious threat to worker safety and has developed a comprehensive set of regulations governing this type of work. This set of regulations is referred to as the Bloodborne Pathogen Program. This appendix contains the University's Bloodborne Pathogen Program.

L. Respiratory Protection Program - Appendix N

The Respiratory Protection Program provides staff and faculty with information about the University's policy on the use of respiratory protection when working in hazardous environments, the types of training required by law and provided by the University as well as the use and maintenance of respiratory protection equipment.

M. Hearing Conservation Program - Appendix O

In response to the need for staff and faculty protection against hearing loss associated with excessively loud and persistent noise, the University of San Francisco established the Hearing Conservation Program. The program discusses the University's policy regarding hearing protection devices, staff and faculty hearing conservation training, annual audiograms, noise level monitoring and record keeping.

N. "Well-Life" Program

The University has established a "Well-Life" Program and employs a Wellness and Fitness Coordinator. The program offers free on-going services which include: personalized exercise programs at the Koret Health and Recreation Center, individual consultation and screening for cholesterol and hypertension (high blood pressure), the Employee Assistance Program (EAP), psychological counseling, nutrition education, weight management, smoking cessation, and stress reduction. In addition, an appointment can be made for an ergonomics specialist to analyze your workstation and work habits to provide suggestions on ways to reduce the strain on eyes, neck, and back as well as reduce or eliminate repetitive motion injuries.

VII. HEALTH AND SAFETY TRAINING

A. Safety Training Requirements

The law requires that the University provide the following types of safety training for all its staff and faculty, including all levels of management, Supervisors and Program Monitors:

1. **Initial Orientation Training** for all new or otherwise untrained staff and faculty. These Initial Orientation Trainings must be documented. Refer to Appendix A for the appropriate form.
2. **Scheduled Periodic Training** for all staff and faculty as a reminder to increase safety awareness in the work place. Refer to Appendix A for the appropriate form.
3. Additional **Hazard Specific Training** for those staff and faculty who work with specific types of machinery or equipment or with hazardous materials. Refer to Appendix A for the appropriate form.

The University is committed to providing thorough and effective training for all its staff and faculty. Staff and faculty are not allowed to perform any task for which they have not been trained. This training shall include an understanding, by the trainee, of the potential job hazards as well as the safe job practice(s). An effective safety training program will benefit the staff, faculty and University by; reducing bodily injuries and damage to property and equipment, reducing the time needed to retrain, increasing staff and faculty safety awareness, increasing efficiency, increasing morale, and decreasing absenteeism.

B. Safety Training Types

1. Initial Orientation Training

Before staff or faculty may begin work at the University, it is required they be familiar with the University's Injury and Illness Prevention Program. Therefore, every staff and faculty member must undergo an **Initial Orientation Training**, which includes the following elements:

- A. A thorough introduction to the University's Injury and Illness Prevention Program.
- B. The University's Safety Rules and enforcement policies.
- C. The procedures for reporting all work-related injuries and hazardous conditions (e.g. to a Supervisor, Program Monitor or anonymously through the Hazardous Condition Report).
- D. Information concerning the areas of health and safety training that are required of staff and faculty and provided by the University.
- E. A clear statement that no staff or faculty member should attempt to do a job without adequate training or if it appears to be unsafe.

Program Monitors, with the assistance and support of their Supervisors, are responsible for administering **Initial Orientation Training** to their new or untrained staff and faculty

members. **Initial Orientation Training**, which includes an introduction to the University's Injury and Illness Prevention Program, must be documented on the **Initial Orientation Training Report** (Appendix A) in order to complete the training. A copy of this completed training form should be sent to the Environmental Safety Manager.

2. Scheduled Periodic Training

For new staff and faculty, the first Scheduled Periodic Training occurs following their Initial Orientation Training. The purpose of the Scheduled Periodic Training is to provide the staff or faculty member training specific for their work assignment. Subsequent safety training is continued through regular Scheduled Periodic Training sessions. Supervisors or Program Monitors conduct Scheduled Periodic Training at a frequency commensurate with each department's hazard risk category as shown in **Table 1, Frequency of Inspections and Scheduled Periodic Safety Training**. Scheduled Periodic Training is also conducted when new substances, processes, procedures, or equipment are introduced into the workplace. Subsequent Scheduled Periodic Training includes the following elements:

- A. Review the established Safe Job Procedures (Appendix E).
- B. Identify hazards associated with new substances, processes, or equipment.
- C. Review the causes of recent injuries and their remediating measures.
- D. Provide any safety information that might be beneficial to the staff or faculty member.

Scheduled Periodic Training must be documented on the **Scheduled Periodic and Hazard Specific Training Report** (Appendix A) in order to complete the training. The staff or faculty member in attendance must sign this form. A copy will be maintained in the Program Monitor's IPP binder and a copy will be sent to the Environmental Safety Manager.

3. Hazard Specific Training

Hazard Specific Training is required for staff and faculty who work with hazardous materials, machinery, or equipment. For example, if personal protective equipment (PPE) is required to perform the job, instructions will be given on its proper use and care. When appropriate this training should include the use of other University safety documents, such as the Hazard Communication Plan, Chemical Hygiene Plan, Hazardous Spill Response Protocol, Hearing Conservation Program or Respiratory Protection Program.

Hazard Specific Training is administered by the Supervisor, Program Monitor, or a qualified third party and must be documented on the **Scheduled Periodic and Hazard Specific Training Report** (Appendix A) in order to be complete. The staff and faculty in attendance must sign this form. A copy will be maintained in the Program Monitors's IPP binder and a copy will be sent to the Environmental Safety Manager

VIII. INSPECTIONS AND HAZARD REMEDIATION

A. Identification of Hazards

1. Accident Reports

The law requires that the University maintain a log of "Occupational Injuries and Illness," which are recorded on Cal-OSHA Form 200, and that all occupational injuries are reported to the Division of Labor Statistics and Research. The University completes an "Employer's Report of Injury (DSL5020)" form for each accident, a copy of which is sent to the University's insurance carrier.

The University is committed to reducing the frequency and severity of accidents that occur on its premises. Towards that end, the University established the Subcommittee on Workers Compensation Claims, which investigates the most frequent accidents, hazardous locations, jobs, and equipment, and implements appropriate preventive measures.

2. Periodic Scheduled Inspections

Program Monitors, Supervisors, and the University's insurance companies conduct periodic Scheduled Inspections in all University departments. Inspections are held at a frequency listed in **Table 1 Frequency of Inspections and Scheduled Periodic Safety Training** shown below. A copy of these inspections will be maintained in the Program Monitors's IPP binder and a copy will be sent to the Environmental Safety Manager.

Table 1
Frequency of Inspections and Scheduled Periodic Safety Training

Hazard Risk	Inspection Frequency	Safety Training Frequency	Department
High	Monthly	Bi-weekly New staff New jobs/Hazards	Facilities Management, Public Safety
Moderately High	Monthly	Quarterly New staff New jobs/Hazards	Chemistry, Biology, Physics, Koret
Medium	Quarterly	Quarterly New staff New jobs/Hazards	Mailroom, Purchasing
Low	Annually	Annually New staff New jobs/Hazards	All other areas

Inspections are the principal means of locating hazards before accidents can occur. Since accidents and injuries are caused primarily by unsafe physical conditions or practices, inspections involve a search for both. Program Monitors, Supervisors and staff and faculty will engage in daily ongoing monitoring of their work areas. Formal inspections must be completed according to the schedule using the forms found in **Appendix A**. A copy will be maintained in the Program Monitor's IPP binder and a copy sent to the Environmental Safety Manager. Any hazards or maintenance requiring correction should be reported through the appropriate channels.

3. **Unscheduled Inspections**

In addition to Scheduled Periodic Inspections, Supervisors and Program Monitors will arrange for unscheduled inspections. The list of subjects for these inspections will be chosen randomly, but with particular emphasis placed on the most hazardous equipment, processes or work areas. Surprise inspections must be documented and must occur at least once each year. A copy will be maintained in the Program Monitor's IPP binder and a copy sent to the Environmental Safety Manager.

4. **Newly Discovered Hazards**

When made aware of a workplace hazard the Health and Safety Committee, or a committee member, will conduct an inspection and investigation. The committee will recommend one of the following methods for correcting newly discovered hazards:

- A. Engineering, Mechanical Controls, or Job Redesign: This is the preferred method since it usually eliminates or reduces the hazard and is a permanent solution.
- B. Training: When the preferred method is not possible, sufficient staff and faculty must be trained in the safe job procedures for that hazardous task. Supervisors and Program Monitors will repeatedly check staff and faculty to ensure that they continue to follow the established procedures.
- C. Administrative Control: When training alone can not mitigate the hazard, rotating staff and faculty between jobs can decrease the exposure to a hazardous operation or environment thus improving safety.
- D. Personal Protection Equipment: When **engineering, training, and administrative controls** alone can not abate the hazards OSHA requires that the University provide the staff and faculty with personal protective equipment (PPE), training for its use and any health surveillance that may be required. Such equipment includes but is not limited to eye ware, respirators, gloves, shoes, ear muffs/plugs etc.

5. **Reporting of Hazards**

Staff and faculty are required to immediately report any unsafe condition or hazard that they discover to their Supervisor, Program Monitor, or they may do so *anonymously* on the **Hazardous Condition Report** (Appendix A). The form is addressed to the Environmental Safety Manager and can be mailed through the University's intra-campus mail system (no postage is necessary). *No staff or faculty member will be disciplined or discharged for reporting any workplace hazard or unsafe condition.*

6. **Documentation of Inspections**

Workplace inspections are documented on **IPP Inspection Forms** (Appendix A), which are specific for each department. The University retains the reports for a period of at least 3 years. Records of all inspections are kept in the IPP binder in each department. A copy will be sent to the Environmental Safety Manager.

B. Correcting Identified Hazards

1. Identifying Hazards

When a safety inspection identifies a hazardous condition, it is documented on the **Hazardous Condition Report** (Appendix A). The report may be discussed at the Scheduled Periodic Training or the Health and Safety Committee meeting depending on its severity.

The University considers a hazardous condition to be serious if the hazard is immediately dangerous to life and health, can result injury or may involve hospitalization, a fracture, or permanent disablement. Hazardous conditions likely to cause serious injuries receive our immediate attention.

2. Hazard Remediation

If the identified hazard exists as the result of a problem or defect in the physical plant of the workplace (e.g. faulty or exposed wiring, broken doors or locks) complete a **Hazard Condition Report** found in Appendix A and submit to the Environmental Safety Manager. Include with this a completed Plant Services Work Order Form. Note on the Work Order that this condition has been identified and submitted as a work place hazard.

Supervisors and Program Monitors will immediately report any accident beyond that requiring simple first aid, to the Safety Director. When the Supervisor or Program Monitor can easily accomplish corrective action, the Safety Director should be promptly informed of how and when the condition was corrected. When remediation involves multiple steps or cannot be completed immediately, the Safety Director will develop a plan of action and document it on the **Hazard Remediation Report** (Appendix A). A copy will be sent to the Environmental Safety Manager.

Notice of remediation for a hazardous condition will be posted for the benefit of those staff and faculty members who were affected by the situation. Staff and faculty may call the Safety Director or the Environmental Safety Manager to inquire about the status of remediation for a hazardous condition.

3. Hazards Which Give Rise To A Risk Of Imminent Harm

It is the University's intent to immediately abate any hazard which gives rise to a risk of imminent harm. When a hazard exists that the University cannot immediately abate without endangering staff and faculty, all personnel will be evacuated from the area. All staff and faculty involved in correcting the hazardous condition will receive appropriate training and will be provided with the proper personal protection equipment.

IX. ACCIDENT INVESTIGATION

A. Procedures For Accident Investigation

The Director of Public Safety or a designee thereof will investigate accidents, assure corrective action is taken, and maintain the University's accident records. All accidents resulting in injury or lost time will be investigated in a prompt and timely manner. Non-injury accidents may be investigated at the discretion of the Program Monitor, Supervisor, Safety Director, or Health and Safety Committee.

The University established the Subcommittee On Workers Compensation Claims, which reports its findings to the Health and Safety Committee, to investigate the most frequent accidents, hazardous locations, jobs and equipment. This subcommittee makes suggestions for appropriate preventative measures. The results of this analysis and corrective action taken are discussed at the monthly Health and Safety Committee meetings. Discussions of accidents may also take place in those departments where they occur, as part of the **Scheduled Periodic Training**.

B. Correcting Hazards And Preventing Reoccurrences

The University's policy for correcting hazards and preventing their reoccurrence is to investigate the cause and take immediate steps to correct it. This is done without assigning blame to the staff or faculty member who was involved in the accident or reported the hazard. It is the University's goal to identify and promptly correct unsafe or unhealthy conditions or work practices and to encourage staff and faculty to report accidents and potentially hazardous situations.

Supervisors and Program Monitors can help prevent accidents from reoccurring by having their staff and faculty members read the sections of the Job Safety Handbook that apply to them. The University's established Safe Job Procedures are found in the Job Safety Handbook (Appendix E). Supervisors are expected to enforce the use of Safe Job Procedures by:

1. Recognizing Safe Performance - By recognizing the use of Safe Job Procedures, complimenting the staff and faculty, and using the University's Incentive Program.
2. Correcting Unsafe Activities - By pointing out unsafe or otherwise policy breaking activities, and enforcing the University's Disciplinary Procedures.