

# Building on a Legacy of Excellence

6.8.2

INJURY AND ILLNESS PREVENTION PROGRAM

ADOPT: APRIL 8, 1985

REVISED: July 9, 1991

REVISED: DECEMBER 12, 2000

REVIEWED: MARCH 11, 2008

REVISED BY COMPLETE RESTATEMENT: JUNE 11, 2013 TITLE 8, CALIFORNIA CODE OF REGULATIONS §3203

The Sonoma County Junior College District recognizes that a safe and healthy educational and employment environment is fundamental to the mission of the District. To this end, the District will maintain an effective Injury and Illness Prevention Program (IIPP), The District expects all employees to use safe work practices, and to comply with this IIPP.

# Building on a Legacy of Excellence



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This procedure constitutes the written Injury and Illness Prevention Program for the Sonoma County Junior College District.

#### I. RESPONSIBILITY

The Board of Trustees is ultimately responsible for the effective operation of the Sonoma County Junior College District, and the District's educational and employment environment.

The Board has delegated to the Superintendent/President overall responsibility for establishing and maintaining an effective Injury and Illness Prevention Program (IIPP).

#### A. Administration

Direct administrative responsibility for the District's environmental health and safety programs, including this IIPP, is assigned to the Dean III, Facilities Planning and Operations, who directs the Manager, Environmental Health and Safety to fulfill the following responsibilities:

- Develop, implement, maintain, and update this IIPP and other safety and health programs necessary to ensure a safe and healthy environment for faculty, staff, students, and visitors. This IIPP will be reviewed at least yearly.
- 2. Provide consultation on safety and health related topics for the Board of Trustees, Superintendent/President, Vice Presidents, Deans, Directors, Department Chairs, Managers, Supervising Administrators, Supervisors, Faculty, Classified Staff, Short-Term Non-Continuing Staff, Professional Experts, and Student Employees.
- 3. Provide or arrange for District employee training on safety and health programs.

- 4. Maintain centralized monitoring and documenting of compliance with the District's safety and health programs. Provide for employee access to records as directed by law and policy.
- 5. Assist each campus, center, site, component, cluster, department or other operational unit in creating general and specific safe work practices, including safe working conditions and protective equipment.
- 6. Maintain currency with applicable regulatory, industry, and general environmental health and safety information pertinent to District operations.
- 7. Chair the District's Safety and Health Committee in support of its purpose and functions.

# **B. District Safety and Health Committee**

The District Safety and Health Committee will identify and investigate health and safety hazards, make recommendations, and communicate to the District community on matters of safety and health that pertain to the educational and working environment throughout the District. The District Safety and Health Committee will:

- 1. Hold regular meetings at least once per month.
- 2. Maintain written agendas and minutes of all meetings, and post them on the District's website.
- Establish and maintain a process to inspect all District facilities on a regular basis to locate, identify, and document safety and health hazards and submit a list of corrections and recommendations to the appropriate responsible party.
- Establish and maintain a process to review and if necessary investigate all safety-related incidents including injury accidents, illnesses and deaths for the purpose of recommending corrective action to prevent similar events from recurring.
- 5. Establish and maintain a process to receive and review safety and health related suggestions and reports of hazards from the District community that offers anonymity for the reporting party and protects the freedom of reporting without fear of reprisal.
- 6. Establish a process for review of corrective actions taken by the District with regard to all safety and health inspection reports or citations.

#### C. Vice Presidents and Dean IIIs

- 1. The Vice President, Human Resources ensures that all employee occupational accidents, injuries and illnesses are reported and recorded as required by law, and that the District 's system for compliance with all health and safety regulations remains operational and effective.
- 2. All Vice Presidents and Dean IIIs are responsible in respect to the operating units under their direction to:
  - a) Ensure the operational units comply with the provisions set forth in this IIPP, as well as other environmental health and safety programs.
  - b) Ensure adequate resources are available to the operational units for training and education of employees on environmental health and safety issues pertinent to their duties.
  - c) Ensure adequate resources are available to correct hazardous conditions.
  - d) Ensure that Supervising Administrators, Deans, Directors, Department Chairs, Managers and Supervisors under their direction are trained on hazards and safe practices within their respective areas of responsibility.
  - e) Designate at least one employee to be a Building Safety Coordinator, and one employee to be an Area Safety Coordinator for each building in the operational unit.

# D. Director, Student Health Services

- 1. Administers the District's incident reporting system.
- 2. Receives and/or initiates incident reports on the Santa Rosa Junior College Incident Report Form.
- 3. Reviews the incident reports for conditions or practices that represent safety and health hazards, and forwards these reports to the appropriate responsible party (See Section VI. Hazard Correction).
- Provides copies of the incident report forms and a summary to the Department of Environmental Health and Safety by the second Friday of each month.

# E. Supervising Administrators, Deans, Directors, Managers, and Supervisors

At the operational unit level, the Supervising Administrators, Deans, Directors, Managers and Supervisors are responsible for developing policies and procedures to ensure effective compliance with this IIPP and other

environmental health and safety policies as they relate to their operational unit. They will:

- 1. Identify the hazardous job duties and procedures within the operational unit; develop and maintain written safe work practices that correspond to these hazards; ensure compliance with these work practices.
- 2. Ensure all new employees take part in a New Employee Safety Orientation (NESO) during their first year of employment. The Environmental Health and Safety Department will assist, upon request, in determining additional training needs.
- 3. Ensure employees are instructed in the recognition and avoidance of unsafe conditions, including hazards associated with non-routine tasks and emergency operations.
- 4. Permit only those employees or students qualified by training to operate potentially hazardous equipment.
- 5. Ensure that records documenting all District employee environmental health and safety trainings, not provided by the Environmental Health and Safety Department, are promptly forwarded to the Environmental Health and Safety Department.
- 6. Ensure an inventory of all hazardous materials is maintained by the operational unit, and provided, if requested, to the Environmental Health and Safety Department, including Material Safety Data Sheets for all hazardous materials.
- 7. Ensure that safety procedures and/or manuals from each manufacturer of potentially hazardous equipment are readily available, and identify situations where specialized training is needed.
- 8. Ensure that safety notices are posted in appropriate and conspicuous locations.
- 9. Develop procedures to inform employees of outside contractors who work in areas under the operational unit's jurisdiction of the hazards to which those employees may be exposed.
- 10. Conduct regularly scheduled safety meetings at which operational unit employees can freely discuss safety issues; such meetings may be included as a portion of regularly scheduled meetings.
- 11. Ensure that safety and health education and training programs are developed and implemented for students exposed to hazards in the academic classroom, laboratory or other instructional venue. Education and training must take place prior to any student being assigned to

- potentially hazardous conditions. Education and training records must be maintained in the operational unit for a minimum of three years.
- 12. Ensure the reporting to the Environmental Health and Safety Department, or District Safety and Health Committee, without fear of reprisal, any safety hazard brought to their attention.
- 13. Make allowances so that their employees can attend environmental health and safety trainings, as well as ensure that employees attend such trainings designated as required.
- 14. Notify the Human Resources Department of any volunteers, and ensure that they are provided with safety information and training that is commensurate with their volunteer activities.

# F. Department Chairs

For academic programs the operational unit is the academic department.

- 1. The Department Chair is not the immediate supervisor of department faculty, but serves as a liaison to assist their Supervising Administrator(s), and Dean in the performance of their responsibilities identified in Section I.E. above with regard to faculty as employees.
- 2. The Department Chair is the immediate supervisor of the department's classified staff, short-term non-continuing staff, professional experts, and student employees, and as such, has the responsibilities as identified in Section I.E. above with regard to employees in these employment classifications.
- 3. The Supervising Administrator(s), Dean and Department Chair share those responsibilities identified in Section I.E. that pertain to student safety within the respective academic department.
- 4. In addition, Department Chairs must:
  - a. Notify the Human Resources Department of any volunteers, and ensure that they are provided with safety information and training that is commensurate with their volunteer activities.
  - b. Ensure an inventory of all hazardous materials is maintained by the academic department, and provided, if requested, to the Environmental Health and Safety Department, including Material Safety Data Sheets for all hazardous materials.
  - c. Ensure that safety procedures and/or manuals from each manufacturer of potentially hazardous equipment, used in the academic department, are readily available, and identify situations where specialized training is needed.

- d. Ensure that safety notices are posted in appropriate and conspicuous locations in the academic department.
- e. Develop procedures to inform employees of outside contractors who work in the academic department of the hazards to which those employees may be exposed.
- f. Ensure the reporting to the Environmental Health and Safety Department, or District Safety and Health Committee, without fear of reprisal, any safety hazard brought to his/her attention.

# **G.** Building Safety Coordinators

Each operational unit in a building is responsible for designating one Building Safety Coordinator (BSC). Multiple buildings can be grouped together and considered as one "building" for operational efficiency. The BSC will:

- Act as a liaison between the building's occupants and the operational units identified in the District's Emergency Operations Plan (EOP) with regard to emergency preparedness and response.
- 2. Perform emergency preparedness and response duties as required in the District's EOP.
- 3. Act as a liaison between the building's occupants and the Environmental Health and Safety Department with regard to emergency preparedness and response, health and safety issues, and inspections.
- 4. Act as a liaison between the building's occupants and the Facilities Operations Department with regard to the building's operation, maintenance, and repair.

# H. Area Safety Coordinators

Each operational unit in a building is responsible for designating at least one Area Safety Coordinator (ASC). The BSC and the ASC can be the same person. The ASC will:

- 1. Act as a liaison between the area occupants and the BSC with regard to emergency preparedness and response.
- 2. Perform emergency preparedness and response duties as required in the District's EOP.
- 3. Act as a liaison between the designated area and the Environmental Health and Safety Department with regard to emergency preparedness and response, health and safety issues, and inspections.

4. Act as a liaison between the area occupants and the Facilities Operations Department with regard to the building's operation, maintenance, and repair.

## I. Employees

All full and part-time employees of the District (Superintendent/President, Vice Presidents, Supervising Administrators, Deans, Directors, Department Chairs, Managers, Supervisors, Faculty, Classified Staff, Short-Term Non-Continuing Staff, Professional Experts, and Student Employees) are responsible for the following:

- Identifying safety hazards and asking questions of supervisors when concerned about an unknown hazardous situation, substance, new equipment, or new procedure.
- 2. Reading and complying with safety procedures and guidelines provided by supervisors, following general safe work practices, and following safe work practices specific to their job.
- 3. Reading equipment manuals to understand safe operation of equipment.
- 4. Attending required training sessions to understand and comply with this IIPP, as well as other environmental health and safety programs.
- 5. Reporting safety hazards in the work place or on District property in a timely manner. Employees may report safety hazards without fear of reprisal to their supervisor, the Environmental Health and Safety Department, any member of the District Safety and Health Committee, or anonymously to the Environmental Health and Safety Department via the District's internal mail system or the website (www.santarosa.edu/ehs).

#### J. Students

Students are responsible for the following:

- 1. Complying with safety practices presented by faculty, technical staff, instructional assistants or other authorized individuals.
- Reporting safety hazards in the classroom or on District property. Students may report safety hazards without fear of reprisal to any District employee, the Environmental Health and Safety Department, any member of the District Safety and Health Committee, or anonymously to the Environmental Health and Safety Department via the District's internal mail system or the website (www.santarosa.edu/ehs).
- 3. Complying with all District environmental health and safety policies and procedures.

#### **K.** District Volunteers

Volunteers are responsible for the following:

1. Adhering to the same responsibilities identified for employees in this IIPP.

#### II. COMPLIANCE

The District will encourage and ensure a safe and healthy educational and working environment and compliance with laws, regulations and this IIPP by the following:

# A. Recognition Programs

District safety recognition programs that provide a demonstrable improvement in environmental health and safety compliance will be reviewed and approved by the District Safety and Health Committee.

# B. Education/Training/Evaluation

This IIPP identifies the parties responsible for implementation, monitoring and participation in the cyclical process of education, training, and evaluation. Individuals who refuse to participate in this process will be subject to the District's disciplinary processes.

## C. Disciplinary Processes

The District will enforce disciplinary procedures to ensure compliance with its environmental health and safety policies and programs, employing progressive discipline combined with due process. Serious and/or willful disregard for safety can result in termination for employees, expulsion for students, and criminal prosecution if so warranted. The disciplinary processes for employees, students and visitors are contained in District Policy and Procedures, applicable provisions of local, state and other regulatory codes, and, for District Employees represented by a collective bargaining agent, in collective bargaining agreements.

#### III. COMMUNICATION

- **A.** The District Safety and Health Committee will publish its minutes, agendas and supporting documents on the District website
- **B.** Communication of environmental health and safety related information, whether broad or specific in nature, can be directed toward an individual, a particular group, or the District as a whole. This includes but is not limited to supervisor or faculty instructions; in-person, multi-media, and on-line training programs; and visual, aural, and tactile communications.

- **C.** Concerns, comments, suggestions, or complaints about an environmental health and safety related matter can be made, without fear of reprisal or discrimination of any kind, to the following:
  - 1. Any District employee
  - 2. Any member of the Department of Environmental Health and Safety.
  - 3. Any member of the District Safety and Health Committee.

Anonymous reports can be made to the Department of Environmental Health and Safety through the District's internal mail system or on the website (www.santarosa.edu/ehs).

An optional District Safety Report Form is available from the Department of Environmental Health and Safety or its website (www.santarosa.edu/ehs).

#### IV. HAZARD ASSESSMENT

The District will use the following methods for identifying, evaluating, and

preventing environmental health and safety related hazards and unsafe practices.

# A. Department of Environmental Health and Safety Inspections

The Department of Environmental Health and Safety will perform inspections and hazard assessments anywhere on District owned or controlled property as part of, or in addition to, the District Safety and Health Committee Facility Inspection Program (see below). Every effort will be made to schedule with the affected operational unit inspections and hazard assessments, but inspections may be made on an unannounced or unscheduled basis. Reasons for an inspection or hazard assessment by the Department of Environmental Health and Safety include, but are not limited to:

- 1. The need to verify compliance with safe work practices and other safety requirements, to identify hazards, and to monitor basic safety operations.
- 2. The need to follow-up a previous inspection identifying health and safety concerns.
- 3. The need to respond to a submitted District Safety Report Form, or a request by a District employee or student for health and safety concerns.
- 4. The need to complete an accident investigation, or the follow-up to an accident investigation.
- 5. The need to complete a District compliance audit, or as a compliance audit in response to a regulatory agency citation.

# B. District Safety and Health Committee Facility Inspection Program

Under the leadership of the Manager, Environmental Health and Safety, the District Safety and Health Committee will:

- 1. Establish and maintain a process to inspect all District facilities on a regular basis to locate, identify, and document safety and health hazards and submit a list of corrections and recommendations to the appropriate responsible party.
- Establish and maintain a process to review and if necessary investigate all safety-related incidents including injury accidents, illnesses and deaths for the purpose of recommending corrective action to prevent similar events from recurring.
- Establish and maintain a process for review of corrective actions taken by the District with regard to all safety and health inspection reports or citations.

## C. Area Safety Inspections

Area Safety Coordinators are responsible for performing routine safety inspections and taking necessary corrective action to remediate deficiencies in their areas. It is the responsibility of the Supervising Administrators, Deans, Directors, Department Chairs, Managers and Supervisors to ensure that these inspections are completed, including documentation provided to the Department of Environmental Health and Safety. Inspections are to be performed with the following frequency:

- 1. Inspections for eyewashes and eyewash/showers, fire extinguishers, Emergency Preparedness Handbooks, and first aid kits will occur monthly.
- 2. Area safety inspections will occur at least once a year.
- Inspections to identify new hazards shall be conducted when a new program is first established; whenever new substances, processes, or equipment are introduced to the area that represent a new environmental health and safety hazard; and whenever a new or previously unrecognized hazard is discovered.
- 4. Additional or more/less frequent inspections may be required by the Manager of Environmental Health and Safety to meet federal, state, and local regulations as well as District safety and health objectives.

## D. Regulatory Agency Inspections

Throughout the year regulatory agencies will inspect District facilities on a scheduled or unscheduled basis. The Department of Environmental Health and Safety, Facilities Operations, and the District Safety and Health Committee will promptly address any notices of corrective action or citations.

#### V. ACCIDENT/INJURY/EXPOSURE INVESTIGATIONS

# A. District Safety and Health Committee Accident Investigations

The District Safety and Health Committee will establish and maintain a process to review and if necessary investigate all safety-related incidents including injury accidents, exposures, illnesses and deaths for the purpose of recommending corrective action to prevent similar events from recurring.

# B. Department of Environmental Health and Safety Accident/Injury/Exposure Investigations

The Department of Environmental Health and Safety will perform accident/injury/exposure investigations anywhere on District owned or controlled property as part of, or in addition to, the District Safety and Health Committee's process. Every effort will be made to schedule the investigations

with the affected operational unit, but at times these investigations may be made on an unannounced or unscheduled basis.

## C. Accident/Injury/Exposure Documentation and Reporting

- 1. All accident/injury/exposure incidents are to be documented on the Santa Rosa Junior College Incident Report Form. It is the responsibility of the injured party to inform a District employee of the incident, and it is the responsibility of that District employee to make sure the Incident Report Form is filled out and submitted to Student Health Services as soon as reasonably possible, but no later than the close of the next business day.
- In the case of a work related accident/injury/exposure involving a District employee, the employee will notify the District immediately of the accident/injury/exposure by contacting their immediate supervisor, the Human Resources Department, or Santa Rosa Junior College District Police (evenings or weekends).
- 3. The immediate supervisor will complete and submit a Supervisor's Report of Injury to the Human Resources Department within 8 hours of being notified of the accident/injury/exposure. This is in addition to the Santa Rosa Junior College Incident Report Form.
- 4. All accident/injury/exposure investigations will be documented in writing using the Environmental Health and Safety Department's Accident Investigation Report Form.
- 5. The Vice President, Human Resources will ensure that all employee occupational accidents, injuries and illnesses are reported and recorded as required by law.

## VI. HAZARD CORRECTION

Hazards are identified in a manner including, but not limited to: a hazard assessment, building inspection, accident investigation, or a safety report. Once hazards are identified, the following methods and procedures, in priority order, will be used to correct the hazard in a timely manner based on the severity of the hazard.

### A. Imminent Hazard

- An imminent hazard is any condition or practice that can be expected to cause death or serious physical harm to a person, or serious damage to, or loss of, a District facility before the hazard can be eliminated through normal corrective action.
- 2. Anyone, including individuals conducting a hazard assessment, building inspection, accident investigation, or the follow-up to a safety report shall

notify the Santa Rosa Junior College District Police upon discovering an imminent hazard.

3. Imminent hazards will be addressed immediately.

# B. Major Hazard

- 1. A major hazard is any condition or practice that can be expected to cause physical harm to a person, or damage to a District facility before the hazard can be eliminated through normal corrective action.
- Anyone, including individuals conducting a hazard assessment, building inspection, accident investigation, or the follow-up to a safety report shall notify the Santa Rosa Junior College District Police, the Department of Environmental Health and Safety, or the Facilities Operations Department upon discovering a major hazard.
- 3. Major hazards will be addressed immediately.

#### C. Minor Hazard

- 1. A minor hazard is any condition or practice that could potentially cause physical harm to a person or damage to a District facility, but can be resolved by normal corrective action.
- 2. Anyone identifying a minor hazard can submit a service request to the Facilities Operations Department or a District Safety Report Form to the Department of Environmental Health and Safety.
- 3. Minor hazards will be addressed as soon as reasonably possible.

# D. Red Tag Program

- 1. If any District employee identifies an area, process or piece of equipment as an imminent or major hazard, he/she should attach a "red tag" notice prohibiting use of the area or equipment and contact the Environmental Health and Safety Department.
- 2. Only the Manager of Environmental Health and Safety, or his/her designee may remove a "red tag."
- 3. The "red tag" may not be removed until the hazardous condition no longer exists. However, entry or use may be allowed with the knowledge and prior authorization of the Manager of Environmental Health and Safety, or his/her designee.
- 4. A person who continues to use an item that has been so tagged without authorization, or willfully removes a tag before the hazardous condition is corrected, may be subject to disciplinary action up to and including

termination for employees, expulsion for students, and criminal prosecution if so warranted.

#### VII. TRAINING AND INSTRUCTION

The District will use the following methods for ensuring effective training of District employees and students:

# A. District Employee Safety and Health Training

The Vice Presidents, Deans and Supervising Administrators are responsible for ensuring Directors, Department Chairs, Managers and Supervisors are trained on the hazards and safe work practices in their respective areas of responsibility.

Directors, Department Chairs, Managers and Supervisors are responsible for the safety and health training of District employees in operational units within their respective areas of responsibility. Specifically, these responsibilities include the following:

- 1. Ensuring all new employees take part in a New Employee Safety Orientation (NESO) during their first year of employment. The NESO will include training on the content and purpose of the IIPP as well as general safety and health related topics.
- 2. Ensuring all new employees are trained in the requirements for safe working conditions and practices, as well as job specific safety and health topics and the use of required personal protective equipment.
- Ensuring employees are instructed in the recognition and avoidance of unsafe conditions, including hazards associated with non-routine tasks and emergency operations.
- 4. Ensuring employees are provided training when assigned to a new task, job, or equipment for which training has not been received.
- 5. Permitting only those employees qualified by training, to operate potentially hazardous equipment.
- 6. Ensuring that records documenting all District employee environmental health and safety trainings are promptly forwarded to the Environmental Health and Safety Department.
- 7. Ensuring that employees are evaluated with regard to their compliance with the department's and District's safety and health policies and procedures, and when deficiencies are found refresher training is provided.

8. Making allowances so that employees can attend environmental health and safety trainings, as well as ensure that employees attend such trainings designated as required.

# **B. Student Safety and Health Training**

Student safety and health training in the academic classroom, laboratory or other instructional venue is the responsibility of the Department Chair in general, and the faculty teaching the particular course in question, who will ensure the following:

- 1. Safety and health education and training programs are developed and implemented for students exposed to hazards.
- 2. Safety and health education and training take place prior to the student being assigned to potentially hazardous conditions.
- 3. Students are instructed in the recognition and avoidance of unsafe conditions, including hazards associated with non-routine tasks and emergency operations.
- 4. Only those students qualified by training are permitted to operate potentially hazardous equipment.
- 5. Safety and health education and training records are maintained in the operational unit for a minimum of three years.

#### VIII. RECORD KEEPING

The Department of Environmental Health and Safety must have a copy of all documentation and records pertaining to the following:

#### A. Hazard Assessment

- 1. Job Hazard Analyses
- 2. District Safety and Health Committee Facility Inspection Program Reports
- 3. Department of Environmental Health and Safety Inspections
- 4. Regulatory Inspections
- 5. Hazard Corrections

#### B. Accident/Exposure Investigations

1. Student Health Services Incident Reports

- 2. District Safety and Health Committee Accident/Exposure Investigation Program Reports
- 3. Department of Environmental Health and Safety Accident/Exposure Investigations
- 4. Hazard Corrections

## C. Training and Instruction

The proper documentation of training and instruction requires the following:

- 1. Signed attendance rosters
- 2. Training outline
- 3. Explanation of instructor's qualifications
- 4. Exam questions
- 5. Exam results.

## D. Material Safety Data Sheets

- 1. Each operational unit will maintain a full inventory of all hazardous materials.
- 2. Material Safety Data Sheets for all hazardous materials will be maintained in the operational unit and organized to facilitate retrieval by employees.
- 3. The retention time for Material Safety Data Sheets is thirty (30) years past the last date of use by an employee.

#### E. Employee Exposure and Medical Records

- Employee exposure and medical records that pertain to compliance with District safety and health programs will be maintained with confidentiality for thirty (30) years past the last date of employment except for employees who have worked for less than one (1) year, who will provided with such records upon termination of employment.
- 2. The District recognizes that employees and their designated representatives, and authorized representatives of the Chief of the Division of Occupational Health and Safety (Cal/OSHA) have the right of access to relevant exposure and medical records. When an employee or designated or authorized representative requests access to a record, the District shall assure that access is provided in a reasonable time, place and manner.