

INJURY PREVENTION PROGRAM

Revised Example for Schools

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POLICY

SAFETY AND HEALTH IN THE WORKPLACE

It is our policy to have a safe and healthful workplace. Therefore, we have implemented the Injury and Illness Prevention Program that is outlined on the following pages. In compliance with this Program, we maintain a regular inspection schedule to ensure safe working conditions. We also conduct orientation and training programs to teach employees safe working habits and techniques.

Administrators and supervisors are expected to do everything within their control to ensure a safe environment and to always be in compliance with federal, state, and local safety regulations.

Employees are expected to obey safety rules, follow established "Codes of Safe Practice" and exercise caution in all their work activities.

All employees are expected to immediately report any unsafe conditions to their supervisor. Employees at all levels of the University who are responsible for correcting unsafe conditions should do so.

Working together, we can succeed in having a safe and healthful workplace from which we will all benefit.

Vice President for Finance and Administrative Services

General Safety Rules

Certain basic principles of safety are so important that they can only be expressed as "rules." These safety rules are a basic part of our Injury Prevention Program, and are also part of our disciplinary procedures. All employees need to know and follow these Safety Rules and all supervisory and administrative personnel must enforce them. The following general safety rules apply to all _____ personnel. Safety rules that apply to specific work areas appear in the _____ safety manual, **Safety First!**

1. All work-related injuries or illnesses, however slight, must be reported to your supervisor immediately.
2. Report unsafe conditions in the workplace — including defective tools or other equipment, to your supervisor, the Director of Physical Plant or the Human Resources Manager immediately.
3. Supervisors shall insist on employees observing and obeying safety rules and established safe job procedures.
4. If unsure of how to operate a machine or perform any assigned task, ask your supervisor before proceeding.
5. Personal protective equipment must be worn or used in any area for which it is required.
6. Use only the proper tool for the job. Do not use defective tools or equipment. If the proper tool is not available, request assistance from your supervisor before proceeding.
7. Get assistance in lifting any item which is so bulky, awkward, or heavy that you feel you are unable to lift it safely.
8. If a repetitive task causes you discomfort, or you feel it is unsafe or unhealthy report it to your supervisor immediately.
9. Look where you are going. Make sure there is enough light to see by and do not carry a load that will prevent you from seeing where you are going.
10. Avoid slippery, wet or greasy floors. Clean up wet or greasy spots as they occur.
11. Do not use a chemical unless you fully understand its toxic properties and have gained the knowledge required to work with it safely.
12. Horseplay and/or practical jokes are strictly prohibited.
13. Alcohol and other drugs are prohibited.

ORGANIZATION AND RESPONSIBILITIES

Our Injury Prevention Program is designed to encourage all _____ personnel to participate in helping us reach our goal of having an injury and illness free workplace. While the program meets Federal and State safety and health regulations, this is secondary to our primary goal of promoting safety at _____. It is the management and organization of our Injury Prevention Program that makes the difference between an effective program and one that is largely a waste of time and money. At _____, safety is everyone's responsibility.

An overview of our Injury Prevention Program activities includes the following:

- Assigning responsibility.
- Encourage employees to communicate with all levels of administration regarding safety and health matters.
- New employee safety orientation.
- Department safety training.
- Quarterly Safety Committee meetings.
- Hazard assessment including periodic campus safety inspections.
- Supervisory accident investigation.
- Disciplinary procedure to encourage safety compliance.

The following individuals have responsibility for our Injury Prevention Program:

Sample

Vice President for Finance and Administrative Services

Associate Vice President for Human Resources

Safety Committee

Supervisors

Employees

Specific responsibilities have been assigned as follows:

ADMINISTRATIVE CABINET

While all members of the Administrative Cabinet are responsible for safety and health in the workplace, there is one member with authority and is directly responsible for the safety program.

Name/Title: _____

Some of this person's responsibilities are to:

- Set policy.
- Assign responsibility and accountability to individuals.
- Review and evaluate results.
- Provide active leadership by participation, example, and a demonstrated interest in the program.

SAFETY DIRECTOR

Incumbent: _____ Name/Title

Some of the Safety Director's responsibilities are as follows:

- Coordinate the safety and health activities of all involved individuals and groups such as the safety committee, etc.
- Keep up to date information on local, State, and Federal safety and health regulations.
- Keep all levels of management informed of these laws and standards.
- Plan, organize, and coordinate safety and health training.
- Set up safety and health inspection procedures and follow up to make sure any necessary corrective action is completed.
- Set up accident reporting and investigation procedures. Follow-up on the status of safety recommendations submitted by employees, the Safety Committee, and the workers' compensation safety representative.
- Review injury reports from workers' compensation insurer and provide analysis of data to Safety Committee.
- Set up a program for the medical treatment for injured employees. The program includes, first aid equipment, designated trained First Aiders, and procedures to provide additional medical treatment.
- Maintain liaison with outside agencies such as local and State agencies, and the insurance carrier.
- Keep management informed.

SUPERVISORS

Some of the Supervisors' responsibilities are as follows:

- Keep informed about safety and health regulations and procedures affecting the operations they supervise.
- Make sure every employee receives safety orientation and training.
- Train employees on hazardous materials that are used, handled, or stored in the workplace that they are expected to use.
- Be aware of all safety considerations when introducing a new process, procedures, machine or material into the workplace.
- Make sure that machines and equipment are maintained in safe operating condition.
- Make sure that employees follow all safety and health regulations and work practices, including using required personal protective equipment.
- Investigate accidents that may occur, identify the corrective action necessary to prevent a similar accident from occurring through timely follow-up.
- Report without delay, any unsafe or unhealthful conditions which they cannot correct.

EMPLOYEES

- Work in accordance with the safety rules and regulations.
- Wear appropriate safety equipment as required by the job.
- Report all injuries, unsafe conditions and practices to your supervisor.
- Ask questions if there is a misunderstanding about the way to perform a duty. Do not attempt to perform any job or operate any machinery you have not been properly trained to operate.

· Contribute ideas or suggestions for improvement of the safety program.

SAFETY COMMITTEE

The following individuals serve as members of the Safety Committee:

Suggested staff:

Associate Vice President for Human Resources
Safety Coordinator, Physical Plant
Director, Physical Plant
Director, Public Safety
Human Resources Specialist
Manager, Facilities Maintenance and Projects
Manager, Grounds and Events
Manager, Custodial Services
Manager, Athletic Facilities
Faculty Representative, Science Departments

Some of the Safety Committee members' responsibilities are as follows:

- Meet at least quarterly.
- Participate in and review results of periodic scheduled inspections.
- Participate in investigation and analysis of accidents involving injuries or illness and where appropriate make suggestions for corrective action.
- Review the potential safety or health hazards of all new processes, methods, or materials introduced into the workplace.
- Serve as a conduit for communication between employees and management, investigating any allegations of hazardous conditions brought to a committee member's attention and make it's own inspections and recommendations where necessary.

ACCIDENT REPORTS

Supervisor's Report of Injury

If an accident occurs in a supervisor's area of responsibility, the Supervisor's Report of Accident will be completed within 24 hours or as soon as practical. Specific to the identification of hazard, all factors that may have caused, or contributed to, the accident are to be noted in the appropriate section of this report. The report is filed with the Safety Director who — after review — passes one copy to our insurance carrier.

Supervisors should investigate all incidents that result in injury, first aid or medical treatment. Any and all incidents form the potential for severe physical injury and major equipment damage. Supervisors are also encouraged to investigate close calls.

IDENTIFYING AND EVALUATING WORKPLACE HAZARDS

To maintain a safe and healthful workplace we need to have a way to identify hazards in the workplace. Recognizing that unsafe work practices generally cause more accidents than unsafe conditions (by themselves), we intend to focus on both.

Inspection of the workplace is our primary tool to identify unsafe conditions and practices. The purpose of the inspection is to identify and correct physical conditions, dangers or unsafe work practices before an accident occurs. Inspections of the physical plant facilities and equipment will be conducted each quarter. These inspections will be performed by a competent observer as directed by the Director of Physical Plant. Inspections of the entire campus will be done twice a year in April and October. Each member of the Safety Committee will conduct an inspection of their assigned area. After each inspection, a written report must be prepared and submitted to the Safety Director. Where corrective action is needed, a copy of the report will be forwarded to the Director of Physical Plant who will ensure that corrective action is taken.

In addition to the periodic inspections noted above, hazard assessment are/were made:

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

The majority of accidents result from a person's failure to follow safety procedures and rules. These unsafe acts, as they are called, need to receive your attention. Unsafe acts usually occur quickly, for short periods of time. When you observe an unsafe act, immediately bring it to the employee's attention, explaining what you observed, and how it could contribute to an injury to themselves or others. Then show the employee the expected or correct way of doing the job.

As part of the _____ Safety Program, an inspection check sheet is provided. The inspections should cover:

- Housekeeping.
- Machinery or other equipment without the necessary guards.
- Material handling methods and hazards.
- Electrical hazards (open switches and boxes, machine grounding, defective wiring, etc.).
- Personal protective equipment not being used where required or being used improperly.
- Machinery, hand tools or other equipment in poor condition or being used improperly.
- Uncluttered aisles, working space and overhead clearances.
- Maintenance of equipment furnishings and facilities.
- Physical condition of floors, platforms, stairs and railings, and steel shelving.
- Workplace lighting (working areas, storage areas, aisles, explosion proof, painting or flammable material storage areas).
- Ventilation of work, storage and toilet areas.
- Fire hazards and protective devices. Dirty rags and all combustible materials stored in closed containers.
- Exits, roadways.
- First aid kits, eye wash stations, supplies and equipment.

We must continuously search out and correct unsafe and unhealthful conditions and work practices. This responsibility is everyone's. All employees are responsible for inspecting their own workplace on a daily basis and for promptly reporting unsafe or unhealthful conditions to their immediate supervisor unless they are able to correct the situation themselves.

ACCIDENT INVESTIGATION

The purpose of an accident investigation is the prevention of similar accidents. Identifying the "causes" of the accident must be objective and factual. The purpose is not to place blame.

However, if the injured employee or another employee contributes to the accident as a result of failing to follow operating procedures or safety rules, then appropriate disciplinary action will be taken.

Procedures for investigating all reported workplace accidents and hazardous substance exposures include:

- Interviewing injured workers and witnesses;
- Examining the workplace for factors associated with the accident/exposure;
- Determining the cause of the accident/exposure;
- Taking corrective action to prevent the accident/exposure from recurring; and
- Recording the findings and actions.

The following suggestions will help you perform a successful investigation:

- Visit the accident scene as soon as possible--while facts are fresh and before witnesses forget important details.
- If possible, interview the injured worker at the scene of the accident and "walk" him or her through what happened taking care not to cause the same accident again:
- All interviews should be conducted as privately as possible. Interview witnesses one at a time. Talk with anyone who has knowledge of the equipment or circumstances contributing to an accident, even if they did not witness it first hand.
- Interview witnesses and record information.
- Document details graphically. Use sketches, diagrams and photographs as needed. Take measures when appropriate.
- Focus on causes and hazards. Develop a description of what happened, how it happened why it happened and how it can be prevented. Determine what caused the accident, not just the injury.
- Every investigation should address prevention of future actions. Corrective actions usually involve training or retraining, changing processes or procedures, correcting unsafe conditions or any combination of the above.
- If a third party or defective product contributed to the accident, save any evidence. It could be critical to the recovery of claims cost.
- When investigating an accident, the following questions should be asked:
 - What happened? The investigation should describe what took place that prompted the investigation (i.e., an injury to an employee, an incident that caused production delay, damaged material, or any other conditions recognized as having potential for losses or delays).

- Why did the accident happen? The investigator must obtain all the facts surrounding the occurrence, including: the cause of the accident; the individuals involved in the accident; whether there were any witnesses; whether the employee was qualified to perform the functions involved in the accident; whether the employee was properly trained; whether there were proper operating procedures for the task involved; and whether such procedures were followed and, if not, why.
- What should be done? The person conducting the investigation must determine which aspects require additional attention. The purpose is not to establish blame, but, rather, to determine what type of corrective action will eliminate the causes of the accident and prevent future accidents.
- What action has been taken? Actions already taken to reduce or eliminate the exposures being investigated should be noted, along with those remaining to be addressed. Any interim or temporary precautions should also be noted. Lastly, any pending correction action and reason for delaying its implementation should be noted.

CORRECTING UNSAFE CONDITIONS AND WORK PRACTICES

Maintaining a safe and healthful workplace requires correcting identified potentially hazardous workplace conditions. Knowing and failing to correct potentially hazardous situations is against _____ policy.

Although it is our intention to eliminate all unsafe conditions and work practices as quickly as possible, some corrective action will necessarily require longer periods of time and/or larger expenditures of capital. Because of this, it will be necessary to evaluate the seriousness of the hazards and focus our attention on those that have the potential to cause serious injury or illness.

Hazards shall be corrected according to the following procedures:

- If possible, immediately when observed or discovered; or
- When an imminent hazard exists which cannot be immediately abated without endangering employee(s) and/or property, we will remove all exposed workers from the area except those necessary to correct the existing condition. Workers who are required to correct the hazardous condition shall be provided with the necessary protection.

One way to evaluate the seriousness of a potential injury is to try to determine whether or not the resulting injury would involve hospitalization, amputation of a limb or part of a limb, a fracture, or permanent disfigurement or disablement. These kinds of injuries are certainly serious and conditions likely to cause them should receive our immediate attention.

Another way is to examine our accident records which clearly show us which types of accidents and injuries tend to be more expensive (generally a good measure of severity of the injury).

Once we have determined that an unsafe condition or work practice exists, and have evaluated the seriousness of this hazard we need to decide what to do about it — and, get it done.

All _____ personnel have a responsibility for helping to make sure we all have a safe and healthful place to work.

Corrective action generally falls into four categories:

1. Engineering or mechanical controls or job redesign — this is the preferred method since it usually eliminates or reduces the hazard and is a permanent solution.
2. Training — once a safe job procedure has been established, employees can be trained in the proper (safe) method to do the job. While training is always desirable, the problem with this solution is that it requires constant supervision to make sure employees continue to do the job in the manner in which they have been trained to do.
3. Administrative Control — for instance, we can limit the amount of time an employee is exposed to a repetitive operation, or exposed to a noisy environment. This type of control involves rotating employees between jobs and is difficult to administer.
4. Personal Protective Equipment — It is vital to use hearing protection for noisy areas, proper gloves for material handling or exposure to chemicals, etc. Once again, this solution requires constant supervision to make sure the equipment is used properly.

Often it is quite obvious what corrective action we ought to take. Sometimes there will be several possible solutions. We have several procedures we use to do this:

Procedure: Program Schedule — Corrective Action

When corrective action for an unsafe condition or work practice will involve multiple steps or cannot be completed immediately, a plan of action will be developed. It will include who is responsible and the estimated date of completion.

Procedure: Accident — Corrective Action Under Supervisor Control

Our policy requires that supervisors complete an accident report whenever an accident occurs. When corrective action is under the supervisor's control, the supervisor will indicate what is being done and also note the approximate date the condition will be corrected.

Procedure: Safety Inspection - Corrective Action

When the regular safety inspection discloses an unsafe condition or job practice, the corrective action will be noted on the inspection report. This report becomes an attachment to the Safety Committee minutes and is also used to document follow-up and completion date.

SAFETY TRAINING

The law requires that we provide several different types of safety training to our employees:

- A general safety orientation to all new employees.
- Specific training on how to do their assigned job.
- Special training when they work with hazardous materials or certain types of machinery or other equipment.
- Training on how to use any personal protective equipment provided, such as respirators.

These requirements are based upon the assumption that when employees know how to do their job properly, and know the hazards of the job, they will work safely.

Training and instruction is provided:

- To all new workers;
- To all workers given new job assignments for which training has not previously been provided;
- Whenever new substances, processes, procedures or equipment are introduced to the workplace and represent a new hazard;
- Whenever the employer is made aware of a new or previously unrecognized hazard.
- To supervisors to familiarize them with the safety and health hazards to which workers under their immediate direction and control may be exposed; and
- To all workers with respect to hazards specific to each employee's job assignment.

Safety education and training for employees should commence at the time of employment. Before people actually begin an assigned task they should complete a short training course to familiarize themselves with _____ safety policies. This portion of the training course should include:

- An explanation of ____ safety policy.
- Familiarization with the general safety rules of ____ and enforcement policies.
- The requirement for immediately reporting all injuries along with information on available medical treatment.
- The necessity for reporting all unsafe conditions to their supervisor.
- Information concerning the safety training which will be given by supervisors.
- A clear statement that no employee should attempt to do a job that appears to be unsafe.

The above general safety training will be conducted by the Office of Human Resources. Employees who are assigned to work in Physical Plant or Security will receive additional safety education and training by their immediate supervisor. The supervisor should continue the safety instructions by discussing the safety rules of that specific department. This should be followed by instruction in the hazards associated with the specific job to which the worker is being assigned. As an example, if personal protective equipment is required on the job, it should be issued and instructions given in the use of this equipment. It is most desirable to follow this initial instruction by a complete review within a week or two after assignment to the job. This will assure that the new employee fully understands the information given at the time of employment and at the time of assignment to the job.

Procedure: Safety Orientation

Supervisors, with assistance from the Safety Director if desired, will provide every employee under their jurisdiction with a general orientation to our safety policy and our safety rules along with safety instructions specific to the employee's assigned job and any personal protective equipment they may be issued. This training is to be documented on the Employee Safety Orientation. The Employee Safety Orientation form is to be signed by the employees and retained in their file.

Department Safety Meetings

Purpose: Department safety meetings are short (5-10 minutes), on the job meetings to help build employee safety awareness. Safety meetings can be used to address actual problems which exist on the job. The supervisor leading the meeting can draw on the experience of employees of the department and use that experience to remind all workers, especially newer workers, of the dangers of working with particular kinds of machinery, tools, equipment and materials. Documentation of the topics covered and employees present must be maintained for all department safety meetings.

What to Talk About: Talk about work practices, machinery, tools, equipment, materials, attitudes and anything else which may cause or contribute to a work-related accident or illness.

Choose a topic where you think safety review may be needed. For example, if you notice that walkways are blocked because boxes or files are not picked up, discuss it. If there has been an accident or a near accident on the job, talk about it. What happened? Where did it happen? How can it be prevented from happening again? Suggested topics are included in Appendix A.

How to Run a Good Meeting:

- Hold the meeting where people can sit and relax.
- Be sure to communicate in a manner that is readily understandable.
- Hold the meeting at the beginning of work, right after lunch or after a break.
- Choose the topic carefully. Topics should be about health and safety problems which really exist on the job. Research the problem before the meeting. There is plenty of easy-to-read material around on almost every hazard you can think of. For machinery, consult the manufacturer's operations manual; for handling toxic substances, get a copy of the material safety data sheet.
- Don't choose too broad a topic. You can't cover Ergonomics in a 5-10 minute meeting. Instead, try a topic like "Adjusting your Chair."
- Encourage as much employee participation, but keep your meeting short.

Selected training materials and sources for obtaining additional materials are available in the Office of Human Resources.

COMMUNICATION

Our Injury Prevention Program is designed to allow — and encourage — employees to communicate with various levels of administration on safety, health and security matters and

also to provide the necessary mechanism for administration to keep employees informed regarding matters important to their health and safety in a manner readily understandable by all.

All employees are encouraged to inform their supervisor of any concern they have about the potential hazards of their workplace. Employees may also inform the Safety Committee, the Safety Director, or administrators about such concerns. Employees who wish to do so, may also report concerns anonymously by sending a written notification to the Safety Director.

Employees are required to report immediately any incident involving a threat or act of violence to their supervisor or, if they prefer, the Human Resources Manager. The supervisor must report the matter immediately to the Human Resources Manager who will investigate the matter and take appropriate corrective action.

There are many methods that administration can use to inform employees of health and safety matters. However, whatever method is used, administration is responsible to ensure that employees understand the situation and what action or changes both administration and the employee must take.

DISCIPLINE - RIGHTS AND RESPONSIBILITIES

It is our intention to provide a workplace as free of safety and health hazards as possible for our employees. Doing so will minimize occupational injuries and illness which can have tragic effects on the lives of our employees.

California state law requires us to have a "system for ensuring that employees comply with safe and healthy work practices — which may include disciplinary action." We do have a disciplinary policy and all levels of administration are expected to apply this policy uniformly and without exception.

Just as the law requires us to provide a workplace free of safety and health hazards — so does the law require employees to comply with established safe practices, which would include complying with safety rules and using any and all personal protective equipment we provide. All supervisors are to enforce our safety rules and ensure that employees comply with established safe practices (including use of personal protective equipment).

An unsafe job procedure is not to be tolerated. Any supervisor or administrator observing unsafe job behavior is expected to bring it to the attention of the person's supervisor. Supervisors are expected to take steps immediately to correct the behavior.

Any disciplinary measures taken must adhere to ___ policy and procedures as noted in the _____ Staff Handbook. Formal retraining on safety procedures will be performed as needed

_____ considers threats and/or acts of violence by its employees a serious violation of School policy. All reports of threatening or violent conduct will be thoroughly investigated. Based on the circumstances and nature of such conduct, the School may forego the above mentioned

disciplinary steps. Employees who engage in threatening or violent behavior will be subject to a range of disciplinary actions up to and including termination.