

CSUCI Injury and Illness Prevention Program

1.0 References

- Title 8, California Code of Regulations, §3203 (8 CCR 3203)

2.0 Administering Agency

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

3.0 Statement

It is the intent of California State University, Channel Islands (CSUCI) to develop Policies and Procedures to comply with Labor Code §6401.7 (SB 198) and General Industry Safety Order §3203, "Injury & Illness Prevention Program."

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

Departments must periodically inspect for unsafe conditions and work practices and correct any deficiencies found. Additionally, the Safety office will conduct periodic inspections for unsafe workplace conditions and practices.

4.0 Purpose

Employees have a right and a need to know the potential hazards of their work activities and environment, and such knowledge is essential to reducing the incidence and cost of occupational injury and illness. The CSUCI Injury & Illness Prevention Program (IIPP) is intended to inform the employee of safety precautions necessary to prevent or minimize hazards. This is accomplished through safety meetings, training and reporting programs, and audits.

5.0 Scope

5.1 This program applies to all CSUCI employees.

5.2 This program applies to occupational hazards (physical, chemical, and biological) known to be present in the work place in such a manner that employees may be exposed under normal conditions or in foreseeable emergencies. Use of hazardous materials, repair of electrical devices, and repetitive motion tasks are examples of work which may present these types of hazards at CSUCI.

6.0 Responsibilities

6.1 DIRECTOR OF ENVIRONMENTAL HEALTH AND SAFETY

- The Director has the authority and responsibility to develop, implement, and maintain the Injury & Illness Prevention Program (IIPP).

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- The Director has the authority and responsibility to assess the need for, then develop and maintain other Environmental Health and Safety Programs as judged necessary by hazard analysis, relevant regulation and law, and good practice.
- Assist Departments in complying with IIPP requirements including safety meetings, training and reporting programs, audits, and record keeping;
- Maintain environmental monitoring records;
- Maintain employee exposure records, and
- Provide access to records in accordance with §8.0.

6.2 HUMAN RESOURCES

- Maintain all employee medical records, and
- Provide access to records in accordance with §8.0.

6.3 DEPARTMENT/PROGRAM

- Perform hazard assessments.
- Identify and evaluate hazards whenever new substances, processes, procedures or equipment create a new hazard, or whenever the employer is made aware of a new or previously unrecognized hazard.
- Utilize Job Safety Analysis for new, unusual, or high hazard work.
- Departments, through their Departmental Safety Coordinator if one exists, have the responsibility to implement local procedures to ensure effective compliance with the requirements of this Injury & Illness Prevention Program and other Health and Safety programs that are applicable within the Department/Program area.
- Respond to findings in Health and Safety Audits and document the responses.
- Inform outside contractors who work under the Department's jurisdiction of the hazards to which their employees may be exposed;
- Provide employees with information and training on hazards in their work area at the time of their initial assignment, and whenever a new hazard is introduced into their work area. Inform employees of the hazards of routine tasks, non-routine tasks, and those foreseeable in emergency situations. Training should be communicated in a language readily understood by the employee(s);
- Develop a system designed to encourage employees to inform their supervisors of hazards at the work site without fear of reprisal, and
- Develop a system for ongoing safety training.

6.4 SUPERVISORS

Supervisors play a crucial role in implementing the IIPP. They are responsible for performing a hazard assessment for the particular work to be assigned, determining relevant safety programs then ensuring compliance with those safety programs, and ensuring employees are properly trained before work commences. Hazard assessment will be supplemented by a more formal *Job Safety Analysis* if there is any uncertainty how to perform work safely or if the work exposes employees to new or previously unrecognized hazard.

6.5 EMPLOYEE

Because of the number of potential hazards that may exist or be created in the work environment, employees must first use common sense and good judgment at all times. Each CSUCI employee must comply with all IIPP procedures, whether written or verbal, while performing assigned duties. It must be remembered, however, that no single set of safety procedures can guarantee accident-free employment.

All employees must comply with this safety program. The supervisor must review the information with the employee and answer any questions. New employees must be given training on the basic elements

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of the IIPP by their supervisor prior to starting their work assignment. When employees are given work assignments for which training has not previously been received, training must be conducted. Employees may be disciplined for non-conformance with safety programs and procedures subject to limitations per respective bargaining agreements.

7.0 Program Requirements

The major requirements of the CSUCI IIPP can be grouped into four (4) areas:

- 7.1 Safety Training - Described in Section 10.5
- 7.2 Safety Meetings - The University has a campuswide University Safety Committee that meets regularly. In addition there are a variety of other safety meetings at the department level, at shop level, individual union level, associated with certain types of training, or tailgate meetings.
- 7.3 Identify, evaluate and mitigate safety hazards - Done through safety inspections and assessments, before assigning work, and when a new substance, process, procedure or equipment is introduced that may create a safety hazard. These actions are performed collectively by those responsible for assessments, assigning work, and introducing potential new hazards.
- 7.4 Implement relevant hazard-specific Health and Safety programs - Compliance with these individual hazard-specific safety programs is the responsibility of departments and supervisors based on their performance of a hazard assessment prior to assigning work.

8.0 Record Keeping and Records Access

Record keeping requirements of 8 CCR 3203(d) are addressed in this Section.

- 8.1 Records listed below are required by Cal-OSHA and will be maintained for the following periods:
 - employee exposure records 30 years
 - employee medical records 30 years
 - environmental monitoring records 30 years
 - safety training, safety meetings, safety audits, etc. 3 years
- 8.2 Records required by Cal-OSHA will be maintained as follows: the Safety office will maintain environmental monitoring records and employee exposure records; Personnel will maintain medical records; Departments will maintain records of safety training, safety meetings, safety audits, etc. Original documents or facsimiles of the original documents must be maintained to meet the requirements of this Section. Other methods of record keeping or tracking, such as computer databases, may be used only as supplements.
- 8.3 An employee's records will be made available to that employee upon request.
- 8.4 Information considered to be pertinent to an employee's exposure (to toxic substances or harmful physical agents) record is:
 - work place monitoring or measurement;
 - biological monitoring results which assess the absorption of a substance by body systems; and
 - MSDSs or if these are not available, any other information which reveals the identity of a toxic substance or harmful physical agent.

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- 8.5 Information considered pertinent to an employee medical record made or maintained by a physician, nurse, other health care professional or technician is:
- medical and employment questionnaire or histories;
 - results of medical examinations and laboratory and other diagnostic tests;
 - medical opinions, diagnoses, progress notes, and recommendations;
 - descriptions of treatments, first aid, and prescriptions; and
 - employee medical complaints.
- 8.6 The Safety Office will make a copy of this Injury & Illness Prevention Program (IIPP) available upon request to: employees, employees' designated representatives, and appropriate regulatory agencies

9.0 Evaluation of IIPP Effectiveness

- 9.1 Safety Office Assessments include a records evaluation for compliance with IIPP requirements (section 7.0). Additionally, these assessments include questions to employees about the Injury & Illness Prevention Program (IIPP) and a check for compliance with IIPP procedures.
- 9.2 The form "Employee Injury - Supervisor's Report of Accident," is generated for every employee injury and illness. The Safety Office will review a copy of these accident reports and investigate those accidents which may have been caused by unsafe conditions or acts, inadequate or improper training or procedures, or inadequate protective equipment.

10.0 Summary of Written Program

Note: This section is structured to demonstrate compliance with §3203 of CCR Title 8

10.1 Employer Information:

Organization: CALIFORNIA STATE UNIVERSITY, CHANNEL ISLANDS

Address: ONE UNIVERSITY DRIVE
CAMARILLO CA 93012

Telephone: (805) 437-8847

Type of Business: STATE UNIVERSITY (SIC CODE 8221)

Main Activities: EDUCATION AND RESEARCH

10.2 Person With Authority And Responsibility For Implementing CSUCI's Injury & Illness Prevention Program:

Name/Title: Bill Kupfer/ Director Environment, Safety and Risk Management

Description of Authority and Responsibility: Responsible for developing the IIPP, taking appropriate action to implement it, and monitoring its effectiveness.

10.3 CSUCI's System For Identifying, Evaluation And Preventing Occupational Safety And Health Hazards:

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CSUCI has a variety of systems and programs for identifying, evaluating and preventing occupational safety and health hazards. Following are some of the major components:

- Campus maintains a Safety Office which has the responsibility for developing, implementing, and monitoring the effectiveness of safety and health programs;
- The Safety Office reviews applicable General Industry Safety Orders and other safety Orders that apply to CSUCI's operations;
- Departments and supervisors have the assigned responsibility to identify and evaluate hazards prior to assigning work or whenever new substances, processes, procedures or equipment create a new hazard, or whenever the employer is made aware of a new or previously unrecognized hazard.
- A Job Safety Analysis (form driven) is utilized for new work or work that may involve new or unusual hazards.
- Auditing and inspection program;
- Investigation of occupational accidents, injuries, illnesses, and unusual events that have occurred at CSUCI;
- Evaluation of concerns raised by employees during safety meetings; and
- Evaluation of concerns reported to the Safety Office (including anonymous reports). The follow up to these concerns is documented with a "Health and Safety Concern Report".

10.4 CSUCI's System for Correcting Unsafe or Unhealthy Conditions and Work Practices in a Timely Manner

- Departments and supervisors must properly address hazards before work begins
- Campus maintains a Safety Office which has the primary responsibility for developing, implementing, and monitoring the effectiveness of safety and health programs;
- Unsafe conditions that require repair work (i.e. uneven walking surface) are reported to Plant Operations. Repair requests that involve imminent safety hazards are given top priority, and
- Assessments focusing on unsafe work conditions and practices are conducted.

10.5 Employee Health and Safety Training Program

The employee's direct supervisor ensures that the employee has been trained in the following categories, as they apply to the employee's job assignment.

10.5.1 General Safe/Healthy Work Practices

All new employees complete an Injury and Illness Prevention Program training program prior to starting their assigned job.

10.5.2 Safe Work Practices For Using Hazardous Materials

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The CSUCI Hazard Communication (Hazcom) program, as outlined in the Hazcom Manual, satisfies this requirement. No workers are allowed to work with hazardous materials unless they have received appropriate training as outlined by the Hazcom Program.

10.5.3 Safe Work Practices for Machinery and Equipment

Managers and supervisors have the responsibility of training their employees on the safe use of equipment. No employee shall work with any hazardous equipment without receiving training as to the specific hazards of such equipment. Employees who are required to work with hazardous equipment who have no prior experience with the safe and proper use of the equipment must attend an equipment-specific training course, or be instructed in its safe use by someone trained and skilled in the operation of that equipment. Verification that the employee has received such training shall be in writing.

Hazardous equipment for the purposes of this IIPP, is defined as any equipment that is not designed for general domestic use; has a high electrical potential; mechanical parts that move and have the ability to amputate body parts; can cause crushing injuries; or requires a high level of skill to operate.

No worker is allowed to work with hazardous equipment unless they have received appropriate training as outlined by the equipment use manual provided by the manufacturer.

Managers and supervisors are responsible for ensuring that employees are trained whenever new substances, processes, procedures, or equipment are introduced to the work place and represent a new hazard and whenever the manager or supervisor receives notification of a new or previously unrecognized hazard. Managers and supervisors are to familiarize themselves with the safety and health hazards to which employees under their direction may be exposed.

10.5.4 Specific Hazardous Situations

Confined space entry, trenching, live electrical work, etc., are all specific hazardous situations. An employee involved in work of this type must follow the guidelines provided in the IIPP and specific safety procedures for each situation. Managers and supervisors are responsible for ensuring that safe work practices are followed for any potentially hazardous work situation.

Each Department head is responsible for ensuring that employees receive the necessary training to perform their job safely.

The CSUCI Safety Office also provides safety training on a regular basis. Dates, times, and course overviews for specific health and safety training sessions can be found by contacting the EH&S/Risk Management office (ext. 8847).

10.5.5 Hazardous Substances

Training is provided on a one-on-one basis, between the employee and supervisor. The experienced user must obtain and review the MSDS for pertinent safety information. New users of hazardous materials must first complete the training outlined in section 10.5.2.

10.5.6 Processes

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The term “Process” applies to the production of a product. Since hazardous materials at CSUCI are not used to produce a material product CSUCI does not conduct “processes” or in any way simulate production processes.

10.5.7 Procedures

It is the responsibility of the Safety Office to provide general safety and environmental programs for the campus community. Individual Departments must comply with University Safety Programs. The Safety Office does not provide formal training on all of these programs but will assist with implementation. A Department should request training if they do not clearly understand what is expected by a program. On a yearly basis certain campus departments are audited by the Safety Office for compliance with these programs.

10.5.8 New Equipment

Each Department is responsible for ensuring that the users of any new “hazardous equipment” have been appropriately trained.

The Safety Office will audit to assess the effectiveness and thoroughness of such training. The criteria for evaluating the effectiveness of this training are based on:

- 1) documentation that training has been given;
- 2) injuries associated with the use of the equipment, and
- 3) interviews with the equipment user to assess operational skill and personal knowledge of applicable safety precautions.

10.6 System for Communicating with Employees Regarding Health and Safety Issues

Throughout CSUCI’s occupational safety programs, employees, supervisors, and managers are encouraged to openly and freely discuss safety and health concerns and issues.

The University utilizes several methods (University Safety Committee, Hazard Communication Program, specific program training, University web site) for providing communication with employees on occupational health and safety matters.