

Injury and Illness Prevention Program (IIPP)

TABLE OF CONTENTS

l	PURPOSE	
	A. Background	4
	B. Scope	4
	C. Policy	4
II	DEFINITIONS	5
III	RESPONSIBILITY	5
	A. Human Resources/Risk Management	5
	B. Department Directors	5
	C. Managers and Supervisors	6
	D. Employees	6
	E. The Safety Officer	6
IV	COMPLIANCE	6
	A. Disciplinary Action	6
	B. Employee Evaluations	7
V	COMMUNICATION	7
	A. Bulletin Board Postings	
	B. Department Safety/Tailgate Meetings	
	C. Anonymous Hazard Notification by Employees	8
	D. Hazard Communication	8
VI	INSPECTIONS	9
	A. Formal Inspections	9
	B. Monthly Checklist Inspection Procedure	9
	C. Annual Site Environmental, Health and Safety Inspections	9
	D. Annual Inspection Procedure	
	E. Imminent Hazards	10
VII	ACCIDENTS/INCIDENTS/NEAR-MISSES REPORTING & INVESTIGATIONS	10
	A. Reporting	10
	B. Accidents Involving Non-Employees on City Premises	11
	C. Investigations	11
VIII	TRAINING	11
	A. Core Training	11
	B. Safety Training	13
IX	RECORD KEEPING	11
	A. Training Records	1.
	B. Injury and Illness Reports	12

	C. Medical Examinations & Records	12
Χ	SAFETY COMMITTEE	12
	A. City Safety Committee	12
	B. Committee Membership	12
	C. Committee Purpose	12
	D. Procedure for Conducting Safety Committee Meetings	13
	APPENDICES:	
1.	Employee Hazard Notification	8
2.	Inspection Checklist (Office)	10
3.	Inspection Checklist	10
4.	Hazard Correction Report	10
5.	Report of Incident, Accident and Injury	11
6.	Supervisors Accident Investigation Report	11
7.	Incident/Loss Report	11

I. PURPOSE

A. BACKGROUND

This City-wide Injury and Illness Prevention Program (IIPP) establishes written procedures for the implementation of the Redlands Safety Program. The IIPP assigns responsibility towards preventing, controlling, and eliminating hazardous or potentially hazardous conditions in the workplace and serves as the foundation for all City Safety Programs.

The Cal/OSHA IIPP requirements are found in Title 8, California Code of Regulations, §3203, *Injury and Illness Prevention Program*. This regulation requires that every IIPP address eight areas:

- Responsibility
- Compliance
- Communicating
- Inspections
- Correcting Hazards
- Employee Safety Training
- Accident Investigation
- Recordkeeping

B. SCOPE

This IIPP shall apply to all City departments and offices directly responsible to the City Manager. It is also requested that elective offices and other independent offices and departments comply with the IIPP in the interest of safety and administrative uniformity.

This IIPP shall cover all City employees and all other workers controlled, directed, or directly supervised by the City on the job to the extent that the workers are exposed to work-related hazards associated with their job assignments.

C. POLICY

It is the policy of the City of Redlands that all aspects of Cal/OSHA'S requirements for an injury illness prevention program under Title 8 of California General Industry Safety Orders subchapter 7. General Industry Safety Orders, §3203 shall be implemented and maintained.

II. DEFINITIONS

- Accident: An unplanned event that results in personal injury or property damage.
- <u>Incident:</u> An unplanned event that does not result in a personal injury but may result in property damage or is worthy of recording.
- <u>Employer</u>: Any person in a business who has employees, either paid or unpaid, where the employer receives a benefit from the work of the employee.
- Employee: Any person who works on behalf of an employer, whether paid or unpaid.
- <u>Employer-Employee Relationship</u>: The employer of an employee is determined more by who supervises the work, rather than who pays the employee.
 - *Note: Temporary employees and contractors may become the responsibility of the employer rather than the agency or contracting company under the employer-employee relationship. Also included are volunteers, workers in roles of charity and disaster relief.
- <u>Hazard</u>: Any unsafe practice, procedure, or condition that, if left uncontrolled, may contribute to an accident/incident.
- <u>Near-Miss</u>: An event where harm to employees or the public or where property damage was narrowly avoided and might not be avoided in the future. Examples of such cases include, but are not limited to, a slip on a wet surface with no injury, chemical spill with no exposure, or a mechanical failure such as dropping a load from a crane or forklift with no injuries.
- Qualified Instructor: Unless otherwise specified, a qualified instructor shall be defined as any person who can effectively communicate, instruct, and train employees in the hazards and safe-work practices associated with a work-related task or job assignment through specific training, certification and/or job experience.

III. RESPONSIBILITY (8 CCR 3203(a)(1))

- A. **Human Resources/Risk Management** shall be responsible for the City's overall health and safety program and require that all departments and offices comply with the requirements of the City's IIPP.
- B. **Department Directors** shall have the ongoing responsibility to implement the IIPP and to ensure the health and safety of employees under their control. This is accomplished by communicating the City's emphasis on safety, analyzing work activities for hazard identification and correction, ensuring regular workplace inspections, providing safety training, and encouraging prompt employee reporting of safety concerns without fear of reprisal.

- C. **Managers and Supervisors** shall be responsible to implement the IIPP and safety programs in their work areas. These duties are to include:
 - Review safety policies and procedures to improve departmental health and safety performance;
 - Coordinate and audit basic department safety inspections on a monthly basis;
 - Review the reports from Safety Committee meetings and ensure material discussed at these meetings is posted on bulletin boards and disseminated to employees in their department;
 - If designated, attend Safety Committee meetings;
 - Assist with department safety training;
 - Work with department supervisors to ensure appropriate personal protective gear is available to department employees;
 - Maintain department safety records and documents;
 - Assist with department safety inspections and investigations; and
 - Actively promote safety in the workplace.

Managers and Supervisors shall also ensure that a current printed copy of the IIPP is maintained at each establishment and available for employees to review and be available to answer employee questions about the Program.

- D. **Employees** shall be responsible to follow general safe work practices as well as any Code of Safe Work Practices and comply with OSHA and California Labor Codes applicable to their own actions and conduct. All employees are responsible to promptly report health and safety hazards and injuries in the workplace, refrain from entering into work tasks that require specialized training, protect themselves from recognized and uncontrolled hazards, and not remove, displace, damage, or destroy any safety device, safeguard, notice or warning used in any work area.
- E. The City Safety Officer shall verify that the City of Redlands IIPP remains current. Tasks include, but are not limited to, providing safety related support to departments, collecting OSHA 300 and 300A logs from the City's Workers Compensation Third Party Administrator in order to track, analyze, measure, and report accident prevention performance, implement safety training programs for all employees, assessment of training needs to ensure OSHA compliance, coordination of safety training sessions, identification of personal protective gear and training on appropriate use, and the maintenance of safety training files and records.

IV. COMPLIANCE (8 CCR 3203(a)(2))

A. DISCIPLINARY ACTION

- Failure to comply with safety rules and procedures may result in disciplinary action up to and including termination.
- An employee discovered to be in possession of, or under the influence of alcohol or any controlled substance, may result in disciplinary action up to, and including termination.

- Improper handling or misuse of City of Redlands equipment (vehicles, tools, property, personal protective equipment, safety devices, industrial hygiene devices, etc.) by an employee shall be cause for disciplinary action up to and including termination.
- Failure to report accidents, incidents, near-misses and/or injuries in accordance with safety rules and procedures may result in disciplinary action up to and including termination.

B. EMPLOYEE EVALUATIONS

Managers/Supervisors are given the responsibility to evaluate their employees' safety performance as part of the employee appraisal process. A specific safety factor on the performance appraisal form has been provided to allow managers/supervisors the opportunity to rate their employees' work habits, as they relate to safety.

Managers/Supervisors are required to accurately reflect the employees' approach towards safety by appropriately completing the rating section on the evaluation. Accurate completion of the performance evaluation assists the city in providing recognition to those employees who perform their work assignments in a safe manner. The evaluation also assists the city in informing employees that need to improve their work habits as they relate to safety.

V. COMMUNICATION (IIPP 8 CCR 3203(a)(3))

A. BULLETIN BOARD POSTINGS

Bulletin boards are located at worksites throughout the city. Many questions regarding worker rights and responsibilities can be answered by reviewing the materials contained on these bulletin boards.

- Managers/Supervisors are responsible for the maintenance and updating of work area bulletin boards.
- Safety and Health Protection on the Job shall be posted on the bulletin boards.
- The OSHA 300A Summary of Work-Related Injuries and Illnesses shall be posted on this bulletin board during the period of February 1 through April 30 of each year.
- Employees are to be directed to read and become familiar with the location of, and the materials posted on the bulletin boards monthly.

B. DEPARTMENT SAFETY/ TAILGATE MEETINGS

All Departments are required to have a monthly safety meeting to discuss any safety concerns brought to their attention by Human Resources/Risk Management, recent accidents that may have occurred, safe work procedures, and new/current Cal/OSHA safety policies & regulations.

• Managers/ Supervisors will keep a record of subjects discussed and the employees present at the meeting within their department.

- Records may be audited periodically by Human Resources/Risk Management to ensure compliance and accurate record keeping.
- Departments with field personnel shall conduct these meetings as part of their bi-weekly Tailgate Meetings.

C. ANONYMOUS HAZARD NOTIFICATION BY EMPLOYEES

Open communication between employees and managers/supervisors is encouraged. However, in order to provide all employees with an opportunity to inform the city of environmental, health and safety concerns without fear of reprisal, two methods of anonymous notification have been implemented.

These methods are:

- Complete "Employee Hazard Notification" Appendix 1; or
- Report a safety concern anonymously to the City Safety Officer at 909.798.7514, ext. 1729.

The City Safety Officer will notify the site supervisor of concerns that are received. All notices (corrected and uncorrected) are to be submitted, via the site supervisor, to the City Safety Committee for review and proposed corrective action.

D. HAZARD COMMUNICATION

Specialized training may be required before performing certain jobs within the city. Some of these jobs may include sewer work where entry into confined space is required, equipment repair where energy sources must be locked out, industrial truck operation, etc. Employees who are uncertain of their job training requirements or training qualifications are required to discuss their concern(s) with their direct supervisor, or City Safety Officer before proceeding with the assignment.

Directors, Managers, and Supervisors shall ensure that new employees or transferred employees are trained on the IIPP and the general hazards of the employee's job. Training must also be given whenever new substances, processes, or procedures, or new equipment are introduced to the workplace and represent a new. This training documents must be submitted to Human Resources/Risk Management for file.

Safety Data Sheets (SDS) provide information on the potential hazards of products or chemicals. Hard copies of SDS's for the chemicals used at a site shall be readily available to employees. If an SDS is found to be missing, a new one must be obtained through a written request to the manufacturer. A copy of this request should be kept until the SDS arrives. Online sources of SDS's are acceptable if information is readily accessible to employees. Copies of all SDS's shall be provided to the City Safety Officer.

All equipment shall be operated in accordance with the manufacturer's instructions as specified in the equipment's operating manual. Copies of operating manuals must be kept with each piece of equipment at each site. Employees who are unfamiliar with the operation of a piece of equipment or its potential hazards must read the operating manual and receive training before using the equipment and verify their understanding to be correct through an experienced operator, supervisor, or designated competent

person. All training pertaining to the operation of equipment must be documented using the appropriate safety training forms.

VI. INSPECTIONS (8 CCR 3203(a)(4) & (6))

A. FORMAL INSPECTIONS

Two types of formal inspections shall be conducted:

- Monthly inspections, and
- Annual site environmental, health, and safety inspections.

In addition to the identification and correction of safety concerns through the monthly or annual inspection process, all employees must understand that the informal identification of hazards must also be addressed.

Supervisors shall conduct daily inspections of their areas that are considered high hazard.

B. MONTHLY CHECKLIST INSPECTION PROCEDURE

Certain types of safety equipment (e.g., fire extinguishers, safety showers, eyewashes, etc.) are to be inspected monthly. Each department shall complete "Inspection Checklist (Office)" — Appendix 2 or "Inspection Checklist" — Appendix 3. Any findings shall be documented using, "Hazard Correction Report" — Appendix 4 and submitted to the City Safety Officer along with a copy of the inspection checklist.

Department Directors shall identify safety committee members whose primary responsibility to ensure that the checklist is completed monthly. A copy of the inspection checklist shall be submitted to the City Safety Officer.

Upon completion of the inspection, the City Safety Officer ensures that all deficiencies identified are corrected, and any uncorrected safety deficiencies are appropriately addressed in a timely manner. The Department Director will be notified by the City Safety Officer.

The City Safety Officer shall keep statistics on each division. Monthly safety inspection checklists may be disposed of after two years.

C. ANNUAL SITE ENVIRONMENTAL, HEALTH, AND SAFETY INSPECTIONS

Annual inspections will be completed to ensure that:

- All necessary safety records are appropriately maintained;
- Health and safety inspections have been completed in accordance with this document; and
- Employee training is current and consistent with the appropriate training matrix.

The annual inspection will be completed by site supervisors with the following individuals assisting:

• City Safety Officer

D. ANNUAL INSPECTION PROCEDURE

City Safety Officer shall complete the following:

- Review the previous year's accidents, accident trends, and accident statistics for the division and the facility being inspected.
- Review safety records (e.g., facility inspections, training records).
- Determine if corrective actions for safety deficiencies identified on the monthly Inspection Checklist have been addressed.
- Conduct a physical inspection of the area/facility and list deficiencies, with corrective actions on the Annual Inspection Report. If deficiencies are identified, notification to the Department Head will be made.

E. IMMINENT HAZARDS

- If a condition poses an immediate danger of serious harm or bodily injury and cannot be corrected immediately, the operation must be stopped until the necessary corrections/repairs can be made. In all cases, the supervisor controlling the work area must be notified immediately. All affected work in the area should cease and affected personnel notified of the situation. All affected equipment must be properly locked-out/blocked-out and tagged.
- If the hazard cannot be immediately corrected without endangering employees or property, all personnel must be evacuated except those qualified personnel required to abate the hazard. Such individuals shall be equipped with necessary safeguards and personal protective equipment before addressing the situation. The City Safety Officer shall be notified as soon as possible.

VII. ACCIDENTS/INCIDENTS/NEAR-MISSES REPORTING & INVESTIGATIONS (8 CCR 3203 (a)(5))

A. REPORTING

Employees who are injured at work must report the injury immediately to their supervisor/manager and Human Resources/Risk Management. If non-emergency medical treatment for work-related injuries or illnesses is needed, employees must seek treatment at the City's designated medical treatment facility. If emergency medical treatment is needed, call 911. The injured party will be taken to the appropriate hospital or medical center.

Upon becoming aware of an employee injury or illness, the supervisor will:

- Seek the assistance of emergency services if the injury or illness is of a serious or life-threatening nature, or
- Assess the need for medical attention if the injury or illness does not appear to be of a serious nature. If the supervisor determines that the employee should seek medical attention, the employee is to be directed to the City's designated medical treatment facility.

The supervisor/manager must complete "Report of Incident, Accident and Injury" — Appendix 5 and "Supervisors Accident Investigation Report" — Appendix 6 forward to Human Resources/Risk Management within 24 hours of the incident.

B. ACCIDENTS INVOLVING NON-EMPLOYEES ON CITY PREMISES

Any City employee who witnesses an incident involving a member of the public or any non-employee's interaction with City employees or property will complete an "Incident/Loss Report" – Appendix 7.

C. INVESTIGATIONS

The purpose of an accident/incident/near-misses investigation is to find the cause and prevent further occurrences.

A thorough and properly completed investigation is required to obtain facts. The investigation should focus on causes and hazards. Analysis of what happened and why it happened is aimed at determining how it can be prevented in the future.

Department Directors, Supervisors, and Safety Office will be responsible for investigating all accidents, incidents, near-misses to facilitate the identification and abatement of hazards and unsafe acts. It is important the investigation begin as soon as possible after the event.

VIII. TRAINING (CCR 3203 (a)(7))

A. CORE TRAINING

All employees will be trained regarding the purpose of the IIPP, proper communication procedure, and safe practices for their corresponding jobs. The training will be provided as follows:

- When the IIPP is revised;
- Whenever the employee is given a new assignment;
- Whenever new procedures and equipment are introduced; and
- New employee orientation.

B. SAFETY TRAINING

Supervisors are responsible for ensuring that employees complete appropriate safety training when any of the following conditions are met:

- Employees are given new job assignments for which training has not been previously received.
- New substances, processes, procedures, or equipment are introduced to the workplace and present a new hazard.
- Whenever there is awareness of a new or previously unrecognized hazard.
- In response to a safety concern, accident, incident, near-miss or injury where refresher training is recommended as part of the investigative process.

IX. RECORD KEEPING (8 CCR 3203 (b)(1) & (2))

A. TRAINING RECORDS

The IIPP regulation requires records to be kept of the steps taken to establish and maintain the City of Redlands' Injury and Illness Prevention Program. Documentation and records will be maintained by Human Resources. These records may include:

• Employee training documentation

B. INJURY AND ILLNESS REPORTS

Copies of the "Report of Incident, Accident and Injury" and "Supervisors Accident Investigation Report" shall be forwarded to the City Safety Officer for review and retention.

C. MEDICAL EXAMINATIONS & RECORDS

Employee medical information and exposure records must be maintained for the duration of employment, plus 30 years. These records shall be kept in Human Resources in a secured medical file, separate from other personnel records.

X. SAFETY COMMITTEE (8 CCR 3203(c))

A. CITY SAFETY COMMITTEE

A City Safety Committee shall be established and maintained in accordance with this section and shall meet no less than quarterly.

B. COMMITTEE MEMBERSHIP

A representative from each department shall serve as a member of the City Safety Committee.

- 10.2.1 The City Safety Officer serves as the Committee Chair and is responsible for reporting and discussing committee issues with management.
- 10.2.2 Safety Committees shall consist of:
 - Committee Chair;
 - A Secretary;
 - Human Resources/Risk Management; and
 - A representative from each department.

C. COMMITTEE PURPOSE

- 10.3.1 The purpose of the City Safety Committee is to:
 - Promote safety in the workplace.
 - Review results of the periodic scheduled work site inspections, and address corrective actions as needed;
 - Review incident and accident reports to follow-up on corrective actions needed to reduce the likelihood of future incidents;
 - Develop and submit suggestions to management for preventing future incidents;
 - Review City and Department Codes of The Safety and Health Protection on the Job;
 - Review alleged hazardous conditions brought to the attention of any committee member, and propose methods for corrective actions;
 - Assist with the development and implementation of the annual safety training calendar;
 - Conduct and audit safety training sessions;
 - Perform monthly safety work site inspections; and
 - Make recommendations regarding the City's safety incentive program.

D. PROCEDURE FOR CONDUCTING SAFETY COMMITTEE MEETINGS

- 10.4.1 The Chair of the City Safety Committee:
 - Ensures that the Committee meets, no less than quarterly;
 - Maintains meeting summaries and "Action Items."
- 10.4.2 The Secretary shall prepare and distribute the agenda and meeting minutes. The Secretary shall take attendance to note absences.
- 10.4.3 The City Safety Officer shall gather inspection reports, accident reports, and employee suggestions for corrective action prior to the meeting. The City Safety Officer shall track committee action items as appropriate.