



Injury & Illness Prevention Program



THE CLAREMONT COLLEGES SERVICES

101 South Mills Ave
Claremont, CA 91711

Injury & Illness Prevention Program

Approved:



Date:

1/24/2022

It is the policy of the *Claremont Colleges Services (TCCS)* to provide a safe and healthy workplace environment for all employees and to ensure compliance with all workplace safety regulations set forth by *Title 8 of the California Code of Regulations*. This policy is extended to all employees, students, outside contractors and visitors.

The *Injury and Illness Prevention Program (IIPP)* serves as the key guidance document for all employees to ensure compliance with *Cal/OSHA regulations, California Code of Regulations, Title 8, Section 3203*. It is also the key guidance document for the structure of the *TCCS Health and Safety Program*. This is the basis for the prevention of injuries and exposures which are critical to reducing worker's compensation costs and enabling a "Best Practices Safety Culture" with a goal of zero accidents.

The Eight Components of the Injury Illness Prevention Program

The IIPP is made up of eight parts as required by *Title 8 of the California Code of Regulations Section (3203)*:

1. Responsible Person- person responsible for implementing the IIPP
2. Employee Compliance with Safety Procedures- system for ensuring employee compliance of Health and Safety Workplace Practices
3. Communication With Employees Regarding Safety - method of communication with employees regarding workplace safety
4. Hazard Assessment- procedure for identifying and evaluating workplace hazards
5. Hazard Correction - procedure for correcting unsafe/ unhealthy conditions, practices and procedures
6. Occupational Injury & Illness Investigation- procedure for investigating workplace injuries/illnesses
7. Employee Training and Instruction- procedure for training employees as outlined in Title 8 of the California Code of Regulations
8. Recordkeeping and Employee Access to Medical Records- procedure for maintaining records for all medical procedures, test results and training provided as well as allowing employees access to all medical records, test results and training

RESPONSIBLE PERSON(S)

TCCS's Injury and Illness Prevention Program Administrator(s) are:

- **Amy Mendez, *Safety and Risk Manager*** and
- **Cristina Irwin, *Environmental Health and Safety Coordinator***.

For questions regarding the content of the Injury and Illness Prevention Program, IIPP Administrator(s) may be contacted at EHS@claremont.edu or (909)607-4EHS.

The Responsibilities of the IIPP Administrator(s) include:

- Prepare and update TCC's IIPP
- Implement the provisions in the IIPP
- Investigate accidents, injuries, illnesses and exposures in the workplace
- Ensure routine workplace hazard identification inspections are conducted
- Mitigate identified workplace hazards
- Provide health and safety training to employees
- Institute a Safety Committee
- Establish a procedure for employees to report workplace hazards, accidents, injuries, illnesses and general safety concerns
- Ensure all employees can identify the Injury Illness Prevention Program Administrator(s)

EMPLOYEE COMPLIANCE WITH SAFETY PROCEDURES

Management is responsible for ensuring that all health and safety policies and procedures are clearly communicated and understood by all employees. Supervisors and lead personnel are expected to enforce the rules fairly and uniformly.

All TCCS employees, including supervisors, are responsible for complying with established safe workplace practices. The TCCS system of ensuring all employees comply with these safe workplace practices includes the following:

- Inform employees of the provisions of the IIPP
- Recognize employees who perform safe workplace practices. (This recognition is accomplished by the employee's immediate Supervisor, EH&S Department, or a Safety Committee Member)
- Fair and consistent discipline for employees who fail to comply with safe workplace practices
- The following outlines TCCS's disciplinary process:

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- Verbal Warning with additional safety training, if required
- Written Warning
- Other necessary actions deemed appropriate by employee's immediate supervisor

- Evaluate the safety performance of all employees
- Provide training for employee whose safety performance is deficient
- The responsibilities of supervisors and managers include the following:
 - Implement EH&S policies, safe practices, and written programs
 - Complete all required EH&S training
 - Conduct hazard assessments for all hazardous work
 - Establish written procedures specific to work or research activities
 - Conduct regular safety and housekeeping inspections
 - Hold frequent safety meetings with personnel
 - Provide and require use of hazard controls and personal protective equipment where applicable
 - Encourage employees to report health/safety concerns and make it known there will be no reprisal for these reports
 - Respond to employee safety concerns and implement corrective actions promptly
 - Evaluate the safety performance of all employees
 - Recognize individuals who work in a safe manner and correct/discipline those who do not
 - Stop any work that poses an imminent hazard (likelihood of injury, destruction of property, or death if not discontinued immediately) to personnel, other individuals or the environment
 - Assign appropriate safety training to employees prior to beginning work, retrain when they do not demonstrate good safe practices, and implement routine/continuous training, when required
 - Provide access to and train personnel on the emergency evacuation plan and demonstrate how to locate the assigned assembly areas
 - Report all occupational injuries, illnesses, safety concerns and incidents to EH&S
 - Conduct initial injury and incident investigations promptly so as to determine root cause and implement corrective actions in order to prevent future incidents
- The responsibilities of all employees, students, outside contractors and visitors include the following:

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- Report unsafe conditions, workplace practices, incidents, near miss incidents, or injuries to immediate Supervisor or EH&S Department immediately
- Follow all EH&S policies, safe practices, and written programs, as well as specific safety policies implemented for the specific area
- Use hazard controls and personal protective equipment required and as trained by supervisors
- Complete all required safety training prior to beginning work or as assigned by supervisors or EH&S Department
- Participate in all safety meetings as assigned by supervisor
- Read and follow all health and safety-related signs, posters, warning signals and directions
- Become familiar with building emergency plans and assembly areas for assigned work areas
- Cooperate with and assist in accident and incident investigations, as necessary

COMMUNICATION WITH EMPLOYEES REGARDING SAFETY

All supervisors are responsible for communicating with their employees about occupational health and safety hazards and safeguards to all employees. The TCCS employee communication system includes the following:

- New employee orientation which includes *TCCS's Health and Safety Policies and Procedures* and a review of our *Injury and Illness Prevention Program*.
- A system for employees to anonymously inform management of workplace hazards without fear of reprisal.
- Employees may report unsafe workplace conditions through any of the following methods:
 - Inform their immediate Supervisor
 - Inform EH&S Department
 - Inform a member of the Safety Committee
 - Call the EHS Department Hotline (909)607-4EHS or 7-4EHS
 - Email the EHS Department: EHS@claremont.edu
 - Fill out "*Unsafe Condition Report*," (**Attachment 1**) and submit to the EH&S Department
- Regularly scheduled safety meetings held quarterly or as deemed necessary by the identification of hazards or the frequency of injuries and illnesses.
- Other methods used to communicate with employees including e-mails, TCCS website, department postings and newsletters, handouts, posters/flyers, and safety meetings.
- Our workplace elects to use a labor/management health and safety committee to maintain the communication requirements of the IIPP standard. As required, the committee meets regularly (quarterly, at minimum), to conduct the following:

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- Prepare written records of the safety and health committees' meetings
- Review results of the periodic scheduled inspections
- Review investigations of accidents and exposures and makes suggestions to management for the prevention of future incidents
- Review investigations of alleged hazardous conditions and submits recommendations to assist in the evaluation of employee safety recommendations

The TCCS Safety Committee is responsible for reviewing and making recommendations on safety matters and specific areas of environmental, safety or health concerns.

HAZARD ASSESSMENT

Periodic inspections to identify and evaluate hazards in our workplace will be performed by the following individual(s):

- EH&S Department
- Department Supervisors
- Department Leads
- Employees

Periodic inspections are performed according to the following schedule:

- When new substances, processes, procedures, or equipment are introduced into the workplace which may present the potential for new hazards.
- When new, previously unidentified hazards are recognized
- When occupational injuries and illnesses occur
- When workplace conditions warrant an inspection
- When we permanent or intermittent employees are hired and/or reassigned to perform processes, operations or tasks for which a hazard evaluation has not been previously conducted
- Daily by employees and Supervisors
- Quarterly by Supervisors

Employees are responsible for inspecting tools, equipment and work areas to identify safety hazards on a daily basis. In addition, employees are responsible for reporting workplace hazards to their immediate supervisor, Team Lead, EH&S Department or Safety Committee Member.

Supervisors are responsible for conducting daily inspections of work areas/ operations, conducting quarterly safety inspections and following up on identified workplace hazards and corrections.

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Supervisors may fill out *Unsafe Condition Report (See Attachment 1)* and submit it to EH&S Department or Central Facilities Services.

HAZARD CORRECTION

Unsafe work conditions, practices or procedures will be corrected in a timely manner based on the severity of the hazards. Corrective action is to be taken:

- When a hazard is observed or as soon as it is discovered.
- When an imminent hazard exists which cannot be immediately abated without endangering employee(s) and/or property, in which case all exposed employees will be removed from the area except those necessary to correct the existing condition. (Employees who are required to correct the hazardous condition will be provided with the necessary protection and training).
- When policies for addressing hazards identified in the workplace have been established for the following:
 - Safety
 - Chemical Safety
 - Radiation Safety
 - Laser Safety
 - Laboratory & Research Safety
 - Hazardous Waste Management
 - Electrical Hazard Management
 - Emergency Management
 - Asbestos Management
 - Risk Management
 - Confined Space
 - Ergonomics

All safety hazards shall be reported and documented with corrective actions initiated promptly. Many hazards can be corrected by the Department Supervisor. Other hazards will require work orders and written communications to Central Facilities Services or EH&S Department (**See Attachment 1**).

HALTING OPERATIONS

Authorized personnel as identified in the TCCS Employee Health and Safety Handbook shall have the authority to order a stop to any activity which presents an immediate threat to life, safety or property. When such a hazard is encountered, the TCCS **Executive Director, Vice President of Management and Planning, the Department**

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Supervisor and **EH&S Department** shall be notified immediately.

CAL OSHA prohibits an employer from taking adverse action against any employee for reporting workplace safety hazards. Employees are required to report all safety hazards.

OCCUPATIONAL INJURY AND ILLNESS INVESTIGATIONS

Investigations of workplace accidents, injuries, illnesses and hazardous substance exposures will be conducted by: **Amy Mendez, Safety and Risk Manager**.

Our procedures for investigating accidents, injuries and illnesses and hazardous substance exposures include the following:

- Visit the scene as soon as possible.
- Interview injured employee(s) and witness(es).
- Determining the cause(s) of the accident/exposure.
- Take corrective action to prevent the accident/exposure from reoccurring.
- Identify and address the underlying factor(s) which contributed to the incident.
- Investigate "near miss" incidents when they occur.
- Record all findings and actions taken.
- Take photographs of the accident scene and the employee(s) involved.

Department Supervisors are required to fill out a Supervisor Accident Investigation Report (**See Attachment 2**) and submit to EH&S Department.

EMPLOYEE TRAINING AND INSTRUCTION

All employees, including supervisors, are provided training and instruction on general and job-specific Health and Safety Practices. Training and instruction are provided in the following instances:

- Upon implementation of a new IIPP.
- At time of new employee hire.
- When existing employees are given new job assignments for which training has not previously been provided.
- When new substances, processes, procedures, or equipment are introduced into the workplace and represent a new hazard.
- When anyone is made aware of a new or previously unrecognized hazard.

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- When training of supervisors is conducted in order to familiarize such individuals with health and safety hazards to which employees under their immediate direction and control may be exposed to.
- When training is conducted for employees for the purpose of recognizing specific hazards unique to each employee's job assignment.

We provide training to employees and supervisors on topics such as but not limited to:

- Accident Prevention Signs & Tags
- Emergency Action Plan
- Ergonomics
- Fire Prevention Plan
- Hazard Communication
- Injury Illness Prevention Program
- Job Hazards
- Employee Access to Medical & Exposure Record
- OSHA California Posting Requirements.

Training shall be conducted in one (or more) of the following manners:

- In-person Safety Training
- Online self-paced Safety Training

See (**Attachment 3**) for a copy of the *Training Roster*,

RECORDKEEPING AND EMPLOYEE ACCESS TO MEDICAL RECORDS

TCCS employs more than ten employees and maintains the following records to help effectively implement IIPP:

- Records of scheduled and periodic inspections (to identify unsafe conditions and work practices, including the names of the person(s) conducting the inspection, the unsafe conditions and the work practices that have been identified, as well as the action(s) taken to correct the identified unsafe conditions and work practices). These records are retained for a minimum of one (1) year.
- Documentation of our Health and Safety Training for each worker, including their name, training date(s), types of training and the name(s) of our training provider(s).

The following records will be retained for the minimum length of time indicated below:

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Safety inspection records	Department and EH&S	5 years
Hazard Identification forms on paper	Department and EH&S	5 years
Injury reports and accident investigations	Workers' Compensation	5 years
Employee training documents on paper or online	Department (paper)and EH&S (online)	Duration of Employment
Safety meeting agendas	Department	5 years
Employee exposure records, registered carcinogen records, or other required employee health and safety records	EH&S and Worker's Compensation	30 years or the duration of employment if longer

The master copy of this IIPP can be found at: EH&S Department (hard copy), internal shared drive (electronic copy).

Other copies of the IIPP can be found at: the TCCS website, <https://services.claremont.edu/ehs/>

ATTACHMENT 1

UNSAFE CONDITION REPORT

This form is to be completed by employees and returned to their supervisor. This form must reach the department no later than one (1) day after completion for serious unsafe conditions and no more than three (3) days for other unsafe conditions. Conditions which may cause immediate injury should be reported to your supervisor by phone immediately.

DATE:

TIME:

TO:

FROM:

(Name of person filling out form and job title)DEPARTMENT:

I estimate this unsafe condition is: (circle one)

LIFE-THREATENING

SERIOUS

MINOR

Describe unsafe condition location:

List any equipment model numbers and identification numbers for equipment, buildings,etc. involved in UNSAFE CONDITION:

What actions do you recommend for correcting the unsafe condition?

Discussed with supervisor on(name) (date) (time)

ACTION TAKEN BY SUPERVISOR TO CORRECT HAZARD/DATE:

NO EMPLOYEE will be retaliated against for reporting hazards or potential hazards or formaking suggestions related to safety.

IMPORTANT!!

It is very important to investigate the accident as opposed to the results of the accident. For example, you are not investigating a broken arm, but the factors leading to it. An accident or incident can be a fall, slip, trip, slide, strike against or other contact, being caught in or between, eruption or explosion, burn, or improper movement. Results can range from a simple annoyance to a fatality.

The examples of corrective actions are designed to help you determine some possible actions. It is important that some effective actionis taken, including improving management systems and personal performance as management personnel.

This is not intended to indict,but to effect realistic corrective action.

WHAT ACTION(S) CAN PREVENT A RECURRENCE? (Use this information to help your thought process while attempting to determine all possible contributing factors)	Consider these possible actions, but do not limit yourself. There are numerous possible combinations, and serious thought will be needed to be effective
I. Contributing causes of accidents/incidents	
a. Supervisory Safety Performance	
1. Inadequate or incomplete instruction	Enhance training and follow-up.
2. Safe and healthful work practices not enforced	Stronger and more consistent enforcement
3. Safety not planned as part of job	make safety considerations part of planning any job
4. Infrequent associate safety contacts	Talk about frequently with associates
5. Inadequate or incomplete hazard correction	Document completion of corrections for identified hazards
6. Safety devices not provided	Assure safety devices present and enforce use
b. Mental or Emotional Condition of Associate	
1. Lack of awareness	Evaluate training tactics
2. Inattention	Find out why
3. Improper attitude lack of (safety cooperation, etc.)	Use behavior modification, incl. discipline if necessary
4. Nervous	Find out why
c. Physical Condition of Person	
1. Fatigue	Evaluate for personal problems or needed shift adjustment
2. Deafness or poor hearing	Modify job per ADA requirements or evaluate placement
3. Poor eyesight	Modify job per ADA requirements or evaluate placement
4. Associate not physically matched to the job	Modify job per ADA requirements or evaluate placement
5. Physically challenged	Modify job per ADA requirements or evaluate placement
II. Immediate cause of accidents/incidents	
a. Unsafe acts	
1. Protective equipment or guard provided, but not used	Evaluate rules and correct training and enforcement tactics
2. Poor handling (i.e.: not allowing for sharp or slippery surfaces, poor lifting, etc.)	
3. Proper tools/equipment provided, but not used	Evaluate rules and correct training and enforcement tactics
4. Hazardous movement (i.e.: running, jumping, climbing, etc.)	Evaluate rules and correct training and enforcement tactics
5. Horseplay	Evaluate rules and correct training and enforcement tactics
b. Unsafe Conditions	
1. Absent or ineffective safety device	Determine current requirements and update, if necessary
2. Poor housekeeping	upgrade and enforce housekeeping standards
3. Defective machines, equipment, or tools	Determine current requirements and update, if necessary
4. Improper dress or apparel for the job	Evaluate, upgrade, and enforce safe dress standards
5. Poor illumination, ventilation, etc.	Upgrade and/or repair

IIPP Attachment 2
SUPERVISOR ACCIDENT INVESTIGATION REPORT

SUPERVISOR ACCIDENT INVESTIGATION REPORT

Complete and submit within 12 hours of accident. Call Safety Department immediately if serious injury occurs.

Facility	Dept. No.	Shift	Date
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EMPLOYEE DATA

Employee Name	Start Date	Job Title	Employee ID#
Place where accident or incident occurred	Date of Accident	Time of accident _____am_____pm	
How long in department or job?_ Job specific training conducted. Yes No		Did accident happen during: Regular shift? Overtime? If O.T. How many hours?_____	

SUPERVISOR'S REPORT

Detailed description of employee's activities at time of accident/incident	
Nature of injury, if any (describe injury; indicate part of body, right or left, etc.)	
Contributing Causes (see examples on back; Be honest)	
Immediate causes (see examples on back; Be honest)	
Conclusions (Link contributing and immediate causes together to help track series of events)	
Action Taken to prevent recurrence (Remember, this is the objective of this exercise)	
Is safety assistance recommended? Yes No	
Was first aid administered? Yes If yes, by whom? No	
Were there witnesses? Yes No (If yes, give name and brief account-attach separate paper, if necessary)	Was Medical treatment necessary? Yes No (If yes, give facility name, address, and phone number)

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Is lost time anticipated? Yes No	If yes to either, how long?_
Is modified duty anticipated? Yes No	If modified duty, what job?
Supervisor's Signature	Date:
Department Manager's Signature	Date:

IIPP Attachment 3

Training Roster

Date: _____
 Location: _____
 Instructor: _____

School: _____
 Training Subject: _____

Print Name	Sign Name	Employee ID Number	Email/Phone
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This form is to be retained by the originating School or Department.

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