UNIVERSITY OF CALIFORNIA, SAN DIEGO

INJURY AND ILLNESS PREVENTION PROGRAM (IIPP)

INTRODUCTION

In order to maintain a safe and healthful work environment at UCSD, the Office of Environment, Health and Safety (EH&S) has developed this overall Injury and Illness Prevention Program for all employees to follow. This document describes the goals, statutory authority, and the responsibilities of all employees and students under the Program. It addresses Compliance, Hazard Identification, Accident Investigation, Hazard Mitigation, Training, Hazard Communication, and Program Documentation. By making employee safety a high priority for every UCSD employee we can reduce injuries and illnesses, increase productivity, and promote a safer and healthier environment for all individuals at UCSD.

GOALS

Diligent implementation of this program will reap many benefits for UCSD. Most notably it will:

1. Protect the health and safety of employees. Decrease the potential risk of disease, illness, injury and harmful exposures to UCSD personnel.

2. Reduce workers’ compensation claims and costs.

3. Improve efficiency by reducing the time spent replacing or reassigning injured employees, as well as reduce the need to find and train replacement employees.

4. Improve employee morale and efficiency as employees see that their safety is important to management.

5. Minimize the potential for penalties assessed by various enforcement agencies by maintaining compliance with health and safety codes.

STATUTORY AUTHORITY

California Labor Code Section 6401.7.
California Code of Regulations Title 8, Sections 1509 and 3203.

RESPONSIBILITY

The ultimate responsibility for establishing and maintaining effective environmental, health, and safety policies specific to campus facilities and operations rests with the Chancellor. General policies that govern the activities and responsibilities of the environment, health, and safety program are established under his final authority.
It is the responsibility of Deans, Directors, Department Chairs, Department Heads, Principal Investigators, managers, and supervisors to develop procedures that ensure effective compliance with the Injury and Illness Prevention Program (IIPP), as well as other university health and safety policies related to operations under their control.

Supervisors, including managers and Principal Investigators, are responsible for enforcement of this Program among the employees or students under their direction by carrying out the various duties outlined herein, setting acceptable safety policies and procedures for each employee to follow, and ensuring that employees receive the general safety training offered by EH&S (or equivalent). Each manager and supervisor must also ensure that appropriate job specific safety training is received, and that safety responsibilities are clearly outlined in the job descriptions which govern the employees under their direction. Supervising others also carries the responsibility for knowing how to safely accomplish the tasks assigned each employee, for purchasing appropriate personal protective equipment, and for evaluating employee compliance.

Immediate responsibility for workplace health and safety rests with each individual employee and/or student. Employees and students are responsible for following the established work procedures and safety guidelines in their area, as well as those identified in this Program and in the UCSD General Chemical Safety Guidelines. Employees and students are also responsible for using the personal protective equipment issued to protect them from identified hazards, and for reporting any unsafe conditions to their supervisors.

Environment, Health & Safety is responsible for developing and managing this Injury and Illness Prevention Program. Additional responsibilities include providing consultation to the UCSD community on matters of health and safety; monitoring and advising personnel using radiation, carcinogens and other hazardous materials; interpreting external regulations and recommending appropriate compliance strategies.

COMPLIANCE

Compliance with this Injury and Illness Prevention Program will be achieved in the following manner:

1. Managers and supervisors will set positive examples for working safely and require that all staff under their direction work safely.

2. Managers and supervisors will use all disciplinary procedures available to them to ensure that employees follow established safety policies and procedures. Performance evaluations, verbal counseling, written warnings and other forms of disciplinary action are available.

3. Managers and supervisors will identify the resources necessary to provide a safe work environment for their employees and include them in budget requests.

4. Managers and supervisors will establish appropriate means of recognition for employees who demonstrate safe work practices.
5. Supervisors in the building maintenance divisions must also enforce the Code of Safe Practices sent as an addendum to this Program, and post a copy on their employee bulletin boards.

UCSD has developed this comprehensive Injury and Illness Prevention Program to enhance the health and safety of its faculty, staff, and students. Each department is responsible for implementing the Program as outlined in the following pages.

I. HAZARD IDENTIFICATION

A health and safety inspection program is essential in order to reduce unsafe conditions that may expose faculty, staff, students and visitors to incidents that could result in personal injuries or property damage. It is the responsibility of each department to ensure that appropriate, systematic safety inspections are conducted periodically.

A. Scheduled Safety Inspections:
Upon initial implementation of this Program, inspections of all work areas will be conducted. All inspections will be documented using the attached forms (or equivalent) with appropriate abatement of any hazards detected when new substances or processes are discovered. Thereafter, safety inspections will be conducted at the frequency described below:

1. Office environments - Annual inspections of all office areas will be conducted to detect and eliminate any hazardous conditions that may exist. The attached Office Safety Inspection form (or equivalent) will be used.

2. Shops, cafeterias, warehouses, stores, docks, etc. - Semi-annual inspections of all potentially hazardous areas will be conducted to detect and eliminate any hazardous conditions that may exist. The attached Facility Safety Inspection form (or equivalent) will be used.

3. Laboratories - Semi-annual inspections of all laboratories will be conducted to detect and eliminate any hazardous conditions that may exist. In addition, all guidelines in the General Chemical Safety Guidelines will be followed.

4. Medical clinics - Semi-annual inspections of all medical clinic areas will be conducted to detect and eliminate any hazardous conditions that may exist. The attached Medical Clinics Inspection form (or equivalent) will be used.

B. Unscheduled Safety Inspections:

1. Additional safety inspections will be conducted whenever new equipment or changes in procedures that present new hazards are introduced into the workplace.
2. Environment, Health & Safety will conduct periodic unscheduled safety inspections of all potentially hazardous areas to assist in the maintenance of a safe and healthful workplace.

3. Safety reviews will be conducted when occupational accidents occur to identify and correct hazards that may have contributed to the accident.

4. Environment, Health & Safety is available for consultation and assistance in conducting these various hazard assessments.

II. ACCIDENT INVESTIGATIONS

Supervisors will investigate all accidents, injuries, occupational illnesses, and near-miss incidents to identify the causal factors or attendant hazards. Appropriate repairs or procedural changes will be implemented promptly to mitigate the hazards implicated in these events.

Use the Accident Investigation form to record pertinent information and retain a copy to serve as proper documentation.

Serious occupational injuries, illnesses or exposures to hazardous substances, as defined by Cal/OSHA, must be reported to EH&S no later than eight hours after they become known to the supervisor. These include injuries that cause permanent disfigurement or require hospitalization for a period in excess of 24 hours. EH&S will contact Cal/OSHA, if necessary. An accident investigation will be conducted by EH&S in conjunction with a representative from the injured employee's department.

III. HAZARD MITIGATION

All hazards identified will be promptly investigated and alternate procedures implemented as indicated. The university recognizes that hazards range from imminent dangers to hazards of relatively low risk. Corrective actions or plans, including suitable timetables for completion, are the responsibility of the department. EH&S consultation is available to determine appropriate abatement actions. The attached Hazard Identification form can be used to document identified hazards and the resulting action taken to abate them.

For serious hazards that present an imminent danger to life or limb, immediate action will be taken to mitigate the hazard. The Department Chair/Head, EH&S, and all affected employees will be notified of the hazard. If the hazard cannot be immediately abated, all personnel will be removed from the affected area. Access to the area will be controlled until the safety of personnel can be assured.

If continued use of the area or equipment must be maintained, then affected personnel will be provided with the proper training, protective equipment, or other safeguards deemed necessary to protect them from the hazard.
Serious concealed dangers will be reported to Environment, Health & Safety at (858) 534-3660, in accordance with UCSD PPM 516-7.3. If the serious concealed danger cannot be abated within 15 days, then it will also be made known to all affected employees in writing.

Environment, Health & Safety is available for consultation and assistance on matters involving hazard mitigation, and for deciding what constitutes a "serious concealed danger." All external reporting requirements will be directed to EH&S.

IV. TRAINING

Effective dissemination of safety information lies at the very heart of a successful Injury and Illness Prevention Program. All employees must be trained in general safe work practices. In addition, specific instruction with respect to hazards unique to each employee's job assignment will be provided.

A. General Safe Work Practices:

At a minimum, all employees will be trained in the following:

1. Fire safety, evacuation and emergency procedures
2. Earthquake preparedness
3. Campus emergency management
4. Safe computer workstation use (if applicable)
5. Hazard communication and awareness (use of Safety Data Sheets)

Attendance at one of the regularly scheduled general Injury & Illness Prevention Program or Laboratory Safety for Professionals/IIPP classes will meet this requirement.

B. Specific Safe Work Practices:

In addition to this general training, each employee will be instructed how to protect themselves from the hazards specific to their individual job duties. At a minimum, this entails how to use workplace equipment, safe handling of hazardous materials, and use of personal protective equipment. Training must be completed before beginning to work on assigned equipment, and whenever new hazards or changes in procedures are implemented.

Managers are responsible for providing supervisors with the training necessary to familiarize themselves with the safety and health hazards their employees are exposed to.

It is the responsibility of each supervisor to know the hazards related to his/her employee's job tasks, and ensure they receive appropriate training.

1. Supervisors will ensure that all employees receive general and job-specific training prior to initial or new job assignments.
2. Supervisors will ensure that employees are trained whenever new substances, processes, procedures or equipment are introduced to the workplace that may create new hazards. Training must also be given when new or previously unrecognized hazards are brought to a supervisor's attention.

6. All training will be documented and kept in department files. The attached Employee Training Checklist form (or equivalent) can be used for this purpose.

V. COMMUNICATION

Effective two-way communication that involves employee input on matters of workplace safety is essential to maintaining an effective Injury and Illness Prevention Program. To foster better safety communication the following guidelines will be implemented:

The department will use an employee bulletin board for posting information on safety in a location accessible to all employees. If a fire exit corridor location is chosen, the bulletin board should be enclosed behind glass. Changes in protocol, safety bulletins, accident statistics, training announcements, and other safety information will be posted as they become available.

Managers and supervisors will provide time at periodic staff meetings (building maintenance personnel must meet at least every 10 working days) to discuss safety topics. Status reports will be given on safety inspections, hazard mitigation projects, and accident investigation results, as well as feedback to previous employee suggestions. Employees will be encouraged to participate and give suggestions without fear of reprisal. The attached Supervisor's Safety Meeting form (or equivalent) should be used to document attendance and topics covered.

The department will use Safety Data Sheets as one form of employer to employee communication. Additional communication methods include:

- Posters
- Newsletters
- General Chemical Safety Guidelines
- Operator Manuals
- Code of Safe Practices
- Standard Operating Procedures
- Meetings
- Bulletins
- Manuals
- Warning Labels

Employees are encouraged to bring to the University's attention any potential health or safety hazard that may exist in the work area. A mechanism for anonymous employee input, such as a suggestion box or mail station for safety suggestions, hazard identification, complaints, etc., which is accessible to all employees will be implemented. The attached Employee Safety Recommendation form (or equivalent)
can be used for this purpose. These forms may also be sent directly to EH&S for follow-up (Mail Code 0920).

Employees are advised that there are no reprisals for expressing a concern, comment, suggestion, or complaint about a safety matter, and that adherence to safe work practices and proper use of personal protective equipment are integral parts of workplace safety.

Supervisors will follow up all suggestions and investigate the concerns brought up through these communication methods, utilizing EH&S assistance if needed. Feedback to the employees is critical, and must be provided for effective two-way communication.

Compliance will be reinforced by appropriate comments on performance evaluations.

Non-compliance will be addressed by:

- An immediate discussion between the supervisor and the employee who is discovered working in an unsafe manner
- Appropriate disciplinary action up to dismissal

The department will pursue readily understandable health and safety communications for dissemination to all affected employees.

VI. DOCUMENTATION

Many standards and regulations of Cal/OSHA contain requirements for the maintenance and retention of records for occupational injuries and illnesses, medical surveillance, exposure monitoring, inspections, and other activities relevant to occupational health and safety. To comply with these regulations, as well as to demonstrate that the critical elements of this Injury and Illness Prevention Program are being implemented, the following records will be kept on file in the department for at least the length of time indicated below:

1. Copies of all IIPP Safety Inspection forms. Retain 5 years.
2. Copies of all Hazard Identification forms. Retain 5 years.
3. Copies of all Accident Investigation forms. Retain 5 years.
4. Copies of all Employee training documents. Retain for duration of each individual's employment. Staff Education and Development provides access to an employee's training history, listing courses registered for and completed via the UC Learning Center.
5. Copies of all safety postings and safety meeting agendas. Retain 5 years.
7. Copies of employee exposure records, registered carcinogen records, or other required employee health and safety records. Retain 30 years or for the duration of each individual's employment if greater than 30 years.

The department will ensure that these records are kept in their files, and present them to Cal/OSHA or other regulatory agency representatives if requested. Review of these records will be conducted by EH&S during routine inspections to measure compliance with the Program.

A safe and healthy workplace must be the goal of everyone at UCSD, with responsibility shared by management and staff alike. If you have any questions regarding this Injury and Illness Prevention Program, please contact Environment, Health and Safety at (858) 534-3660, ehsweb@ucsd.edu.

Resources:

- Injury & Illness Prevention Program Training
- Environment, Health & Safety Forms
- UC Learning Center (for training history of programs completed via the UC Learning Center)
- Safety Data Sheet (SDS) Sources
- EH&S Safety Training Manager

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