



INJURY & ILLNESS PREVENTION PROGRAM

SANTA MONICA

COMMUNITY COLLEGE DISTRICT

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INTRODUCTION

The Injury Illness Prevention Program (IIPP) is required by California Senate and implemented under the California Code of Regulations, Title 8, Chapter 4, Section 3203. Title 8 (T8), of the California Code of Regulations (CCR), requires every employer to have an effective Injury and Illness Prevention Program in writing that must be in accord with T8 CCR Section 3203 of the General Industry Safety Orders. The Program covers District employees in all job classifications, including student employees, academic and administrative staff. It also covers all other workers who the employer controls or directs and directly supervises on the job to the extent these workers are exposed to worksite and job assignment specific hazards. Volunteer workers and outside contractors are thus covered under the IIPP.

POLICY

The District will develop and implement an Injury & Illness Prevention Program to meet its obligations of maintaining a safe and healthful work place. The Santa Monica Community College District Board of Trustees, the District and its management, pledge to support this program and to ensure that it remains a viable method of protecting all employees, students, and all other site occupants, according to the California Occupational Safety and Health Act of 1973.

DEFINITIONS

DISTRICT

Santa Monica Community College District is the legal educational agency.

WORKPLACE

The workplace consists of the area of operations to which an employee is assigned (i.e., Santa Monica College, Center for Media & Design (CDM), Airport Arts Campus, Santa Monica Bundy Campus, Emeritus College, or Performing Arts Campus).

RESPONSIBILITY

The Injury and Illness Prevention Program (IIPP) administrators for the Santa Monica Community College District, is the Superintendent/President and Vice Presidents. The Superintendent/President and Vice Presidents have the authority and responsibility for ensuring that District policies and practices are implemented, employees are provided a safe and healthful workplace and that operations are in compliance with the Injury & Illness Prevention Program and applicable with federal, state, and local regulations and standards.

IIPP COORDINATOR

Safety & Risk Management is responsible for the IIPP and implementation of program requirements for each site. Responsibilities include:

- *Annual Review:* Ensure that the Santa Monica Community College IIPP is reviewed annually.
- *Oversight:* Oversee the development of written Cal OSHA required environmental health and safety documents, training programs, and employee training matrices and schedules.
- *Liaison:* Advise management, through the Campus Safety Committee, on safety policy and procedure development needs, concerns, and progress.
- *Consultation:* Provide guidance on new or proposed regulatory requirements.
- *Resource Allocation:* Assist in the identification of financial and physical resources necessary for the correction of substantiated safety deficiencies.

DEPARTMENT HEADS, CHAIRS, AND MANAGERS

- *Ensure Compliance:* Ensure that the IIPP is being followed within their Departments.
- *Resource Allocation:* Substantiate the need for, and request through the appropriate management command chain, resources necessary for the correction of safety hazards.
- *Ensure Effectiveness:* Evaluate, with the assistance of staff input, the effectiveness of safety programs implemented, and provide recommendations for improvement to the Campus Safety and Environmental Health Committee.
- *Disciplinary Actions:* Assist supervisors in taking appropriate actions against employees, who knowingly and/or consistently violate safety rules and guidelines.
- *Training:* Ensure that their employees are appropriately trained for the responsibilities assigned.

SUPERVISORS & LEAD PERSONNEL

- *Ensure Compliance:* Ensure that the IIPP and other safety programs are followed within their work groups.
- *Safety Concerns:* Assist employees in identifying and correcting safety concerns.

- *Corrective Actions:* Identify and take appropriate action to correct safety and environmental health deficiencies.
- *Notification:* Notify their Manager/Chair when the correction of deficiencies requires the allocation of financial and physical resources beyond the Supervisor's or Lead Person's authority.
- *Disciplinary Action:* Recommend corrective or disciplinary action to the manager when employees knowingly and/or consistently violate safe work practices.
- *Enforcement:* Enforce the use of all required personal protective equipment (PPE), safety programs or procedures necessary for the safe completion of an employee's job responsibilities.
- *Training:* Ensure that employees are appropriately trained for the responsibilities assigned.

EMPLOYEES

- *Compliance:* Employees must comply with the provisions of the IIPP and health and safety regulations.
- *Corrective Action:* Take appropriate action to protect themselves and coworkers from recognized hazards. Immediately take appropriate action to abate and correct unsafe or potentially hazardous conditions or report them to a supervisor, manager, or someone who can abate the unsafe condition.
- *Training:* Employees are expected to actively participate in safety and health training and other related activities. Complete all assigned safety training requirements. Refrain from entering into work tasks that require specialized training, until such training has been completed.

CONTRACTORS AND VENDORS

Contractors and vendors must have their own IIPP and their program must be compliant with the District's IIPP. Contractors and vendors must meet all regulatory requirements and actively participate in site health and safety activities as required in contracts and/or purchase orders.

OTHERS UNDER THE PURVUE OF THE IIPP

All others (e.g., associated student officers, student aides) under the purview of this IIPP must comply with the provisions of the program and health and safety regulations, promptly report unsafe activities and conditions to management, and actively participate in safety and health training and other related activities.

VISITORS AND GUESTS

Visitors and guests must comply with site health and safety requirements and participate in IIPP activities if required.

PLAN REVIEW

The Injury & Illness Prevention Program Administrator will be responsible for ensuring the IIPP is reviewed at least once during the first year after implementation and then at least annually thereafter.

The review will be to ensure that the written plan is appropriate for the District at the time of the review and for any anticipated future changes. The IIPP Administrator or designee will be required to provide written notice to the Vice President or designee that the review was conducted and communicate any changes, modifications, and/or improvements to the IIPP were conducted.

OCCUPATIONAL SAFETY & HEALTH WORK PRACTICES-COMPLIANCE

The President, through the IIPP Coordinator, will implement a system or systems to ensure that all employees comply with workplace safety and health practices.

The system or combination of systems will include any one or combination of the following:

1. Training and retraining programs - Training and retraining needs have been identified and published in the annual schedule of safety and health training.
2. IIPP procedure and updates pertaining to safety will be published annually.
3. Administrators and classified leadership will monitor ongoing performance and participation as required in the IIPP through the performance appraisal process as identified in the administrative procedures and collective bargaining agreements.
4. *Employee Evaluations*: Supervisors are required to accurately reflect the employee's safety performance on an annual basis, during the annual written evaluation process. Employees who receive unsatisfactory safety performance reviews should be placed on a plan of improvement.
5. *Recognition Procedure: Letter of Commendation* – Employees who enhance the Santa Monica College Safety Program through the development of safety devices, practices, or work-area and equipment specific safety procedures should be formally commended. The process by which *Letters of Commendation* are awarded, prepared, and presented is left to the discretion of the individual Program Heads.
6. *Disciplinary Action Procedure*: The supervisor assists in documenting and recommending, through appropriate lines of management, disciplinary action when an employee knowingly or consistently violates safety rules. Employees found violating workplace safety practices or found jeopardizing the safety of any other employee, student, or visitor shall be subject to disciplinary action in accordance with the existing District policies, administrative procedures, and collective bargaining agreements. Disciplinary action shall be taken for violations of

management directives, rules, regulations, work practices, or policies. Any action taken will not violate employee rights under Cal/OSHA regulations and will be enforced in a non-discriminatory fashion. Disciplinary action, up to and including termination, can be pursued depending on the type and/or frequency of the violations.

COMMUNICATION

Communication to employees, between employees and the District on matters relating to occupational safety and health is an important aspect of ensuring the success of the District's Injury & Illness Prevention Program. Therefore, through the IIPP Coordinator the District will implement a system or combination of systems intended to accomplish the following:

1. Provide a means for the District to communicate to employees, in a readily understandable form, on matters relating to occupational safety and health; and
2. Encourage employees to inform the District of workplace hazards without fear of reprisal.

The communication portion of this IIPP will consist of any one or combination of the following:

1. **TRAINING AND RETRAINING PROGRAMS.** Safety training and retraining classes are a forum for the discussion of specific and general safety, health and compliance best practices.
2. **MEETINGS.** Department managers will conduct safety meetings or staff meetings, which may include the discussion of safety issues or specific safety topics. These meetings are intended as a brief session to discuss one or more safety items and encourage open discussions between employees and management.
3. **ANONYMOUS NOTIFICATIONS.** Notifications can be submitted using inter-department mail sent to management, open forums, training classes, to supervisors, through union representatives, or through the human resources department. Department Managers will submit all anonymous notifications to the Safety & Risk Management Department.
4. **MISCELLANEOUS.** When appropriate, the District may use written communications such as inter-District memos, electronic media, envelope stuffers, newsletters, and workplace postings to supplement the previously described systems and further communicate to employees on matters relating to workplace safety and health.

EVALUATION, INVESTIGATION & CORRECTION OF WORKPLACE HAZARDS

A major component in the effectiveness of the Injury & Illness Prevention Program depends on the ability to properly identify, evaluate, and correct workplace hazards. The main system for identifying and evaluating workplace hazards will be ongoing evaluations, inspections, and meetings. The purpose of these inspections and meetings will be to identify and correct unsafe conditions and work practices.

Workplace inspections will be scheduled and can be conducted on an as needed basis using the following criteria:

- An initial inspection when the program is first established;
- An inspection of affected areas whenever new substances, processes, procedures, or equipment are introduced to the workplace and which represents a new occupational safety and/or health hazard;
- An inspection of affected areas whenever the management is made aware of a new or previously unrecognized hazard; and

When occupational illnesses and injuries occur, the IIPP Coordinator or designee will conduct the investigation.

1. **ONGOING INSPECTIONS.** The annual workplace inspection is an important part of the overall inspection program. Department Managers are responsible for ensuring safety inspections are conducted per schedule. These inspections will be conducted with the following considerations:
 - a. The Program Coordinator in conjunction with the Department Manager will designate personnel in conducting inspections.
 - b. Self-inspections of are to be conducted on a periodic basis.
 - c. Inspections may be accomplished using check-off forms or other means of documentation.
 - d. All deficiencies and corrective actions taken shall be appropriately documented. Upon completion of the inspection, the inspecting employee shall provide the completed inspection checklist or other form of documentation, with findings and corrective actions needed or taken, to the department manager or chair. The department manager or chair shall ensure that any uncorrected safety deficiencies are appropriately addressed.
2. **ANNUAL INSPECTIONS.** The District will use outside safety consultants to supplement the in-house inspection program. Inspections by outside safety consultants will be conducted per schedule. The party conducting the professional inspections must have professional

qualifications and safety expertise (e.g., Certified Safety Professional (CSP), a professional member of the American Society of Safety Engineers (ASSE) or a registered Professional Engineer (PE) in safety with demonstrated experience at educational institutions and must carry liability insurance. Copies of consultant's inspection reports will be maintained at least 5 years at the District's Business Office.

3. **SAFETY ACTIVITIES.** Job Safety Analysis (JSA), employee safety training, or issue specific assessments (e.g., department ergonomic studies) may be used in lieu of or to supplement the scheduled workplace inspections.
4. **ACCIDENT INVESTIGATIONS.** Accident investigations will be conducted to identify and correct unsafe conditions and practices. These investigations will be conducted for all work-related injuries and illnesses resulting in employees being unable to work.
5. **CORRECTIONS OF UNSAFE OR UNHEALTHFUL CONDITIONS.** Unsafe or unhealthy work conditions, practices, or procedures shall be corrected in a timely manner based on the severity of the hazards. All employees are expected to take appropriate action to correct hazardous situations that may lead to injury or illness (i.e., correct safety problems under their control, keep work areas free of hazards, notify EH&S or other appropriate supervisors of recognized safety hazards and concerns not under their control).
6. Safety deficiencies that do not pose a threat of injury, illness or death shall be addressed in a timely manner. Hazards shall be corrected according to the following criteria:
 - a. When observed or discovered.
 - b. When an imminent hazard exists that cannot be immediately abated without endangering employee(s) and/or property, all exposed employees, except those properly trained or qualified to correct the existing condition, will be evacuated from the area impacted.
 - c. Following an accident investigation or hazard assessment (e.g., JSA) when unsafe acts or conditions are identified.
 - d. When evidence of repeated unhealthful situation is documented and reported in specific areas.

All such actions taken to correct hazards and corresponding dates of completion shall be documented on the appropriate forms. The responsible Administrators, Deans, Directors and Managers shall be notified of unsafe conditions and corrective action recommended. The supervisor shall ensure that known safety deficiencies are appropriately addressed. Supervisors may seek the assistance from EH&S to identify appropriate methods that may be used for addressing deficiencies.

EMPLOYEE TRAINING

The IIPP Coordinator will implement and maintain an Occupational Safety and Health Training Program for their respective employees. The training program is intended to train and instruct employees in general safety and health work practices, and to provide instruction with regard to hazards specific or unique to each employee's job.

The IIPP Coordinator shall ensure that all supervisors are knowledgeable of the safety and health hazards to which employees under their immediate direction and control may be exposed.

Employee training may include the following elements:

1. All employees will receive training and instruction when the Injury & Illness Prevention Program is first established and when modifications and revisions are completed.
2. New employees shall complete appropriate IIPP training prior to engaging in any potentially hazardous work assignments. General IIPP training shall be completed within two weeks of hire.
3. All affected or potentially affected employees will receive appropriate safety training prior to assignments, when potentially exposed to new hazards, when assigned new work tasks, or when new chemicals/materials, equipment, or processes are introduced into the workplace.
4. Employees will receive refresher training when new or previously unrecognized hazards are identified, when the District feels it is appropriate, or as mandated by regulatory requirements.
5. At a minimum, supervisors should ensure that employees complete initial and refresher training.
6. Employees attending or receiving training mandated by this Program will sign attendance sheets and actively participate in training.
7. Specific employee training will be determined or identified by the Site Coordinator and Department Managers in consultation with safety consultants. This training will be designed to address department and task specific compliance and accident prevention needs. Employees shall not engage in work related duties exposing them to hazardous conditions (hazardous materials included) for which they have not been appropriately trained.

RECORD KEEPING

Records of hazard assessments, safety and hazard inspections, safety meetings, accident investigations and safety, and health training for each employee will be maintained for at least 5 years.

The hazard assessments, health and safety inspections, and accident investigation records will identify the person conducting the inspection/activity, any unsafe conditions or practices identified, and the corrective action(s) taken to eliminate or control the hazard.

Health and safety training records shall include the name of the employees trained, date and type of training provided, and the provider of the training.

The Workers Compensation (WC) District representative must be notified immediately whenever an employee has a serious injury such as an amputation, head trauma or concussion, fatality or beyond a 24-hour stay at a hospital and/or medical center. ***The WC District representative must notify Cal/OSHA via telephone within 8 hours of the serious incident.*** If the incident occurs after hours or on the weekend, the supervisor must contact the WC District representative's office telephone and leave a voicemail report of the incident. Immediately the next working day, the WC District representative must notify Cal/OSHA by telephone:

Cal/OSHA Los Angeles District Office: (213) 576-7451

Required Cal/OSHA Notification Information for a Serious Injury:

Time and date of accident

Employer's name, address and telephone number.

Name and job title of the person reporting the accident.

Address of site of accident or event.

Name of person to contact at site of accident

Name and address of injured employee(s)

Nature of the injury

Location where injured employee(s) was moved to

List and identify other law enforcement agencies present at the site of accident

Description of the accident and whether the accident scene or instrumentality has been altered

APPENDIX I

IDENTIFICATION OF PROGRAM ADMINISTRATOR/COORDINATOR

<ul style="list-style-type: none">• Elaine Polachek, Executive Vice President	IIPP Program Administrator, District
<ul style="list-style-type: none">• Daniel Phillips, Assistant Director Safety & Risk Management	IIPP Program Coordinator, District

APPENDIX II
MANAGEMENT RESPONSIBILITIES

- **Senate Bill 198**

In 1989, the rules for doing business in California took a drastic turn. Senate Bill 198 (SB 198), concerned with occupational health and safety, was approved.

This bill requires employers to identify and correct hazards existing in the workplace to protect their employees.

According to the Legislative Counsel's Digest of the bill, it states that "This Bill [SB 198] would require every employer to establish, implement, and maintain an effective written injury prevention program including specified elements, and to provide specified training of employees in general safe and healthy work practices."

- **Assembly Bill 2249**

Assembly Bill No. 2249 (AB 2249) established that dangerous business practices can be considered a crime and the responsible parties can be held criminally accountable.

The Legislative Digest states "This bill [AB 2249] would provide that a corporation or person who is a manager with respect to a product, facility, equipment, process, place of employment, or business practice, is guilty of a misdemeanor or felony, if the corporation or manager has actual knowledge of a serious concealed immanent that is subject to regulatory authority of an appropriate agency and is associated with that product or a component of that product or business practice and knowingly fails to inform the Division of Occupational Safety and Health and warn affected employees, as specified."

APPENDIX III

ACCIDENT INVESTIGATION FORMS



SANTA MONICA COMMUNITY COLLEGE DISTRICT

SUPERVISOR'S ACCIDENT INVESTIGATION REPORT

NAME OF INJURED: _____

JOB TITLE: _____ SEX: _____ DATE OF BIRTH: _____

DATE OF INCIDENT: _____ HOUR: _____ PHOTOS Y/N

DATE REPORTED: _____ HOUR: _____

ACCIDENT LOCATION: _____

WITNESSES: NAMES; ADDRESSES; PHONE NUMBERS

1. _____

2. _____

TIME NOTIFIED: _____ TIME ON SCENE: _____ TIME OFF SCENE: _____

FIELD INVESTIGATION

EXACT LOCATION OF INCIDENT: _____

Completely describe location of incident including lighting, walking surface, weather, measurements, and any other condition that could have contributed to or prevented the incident:

Describe injuries/illnesses which you observed or which were described to you: _____

Describe demeanor of person involved and include statements made as "Excited Utterances":

Describe shoes, physical appearance or any other characteristic that would contribute to understanding how the accident occurred: _____

Describe how the incident occurred; state facts, contributing factors, cite witnesses and support evidence: _____

Steps taken to prevent similar incident: _____

Did employee seek medical care? (Check one) Yes _____ No _____

If yes, name of medical facility/doctor: _____ Date/Time: _____

Investigator's Signature

Date/Time form completed

Print Investigator's name

APPENDIX IV
SAFETY ACTION FORM

SAFETY ACTION FORM
Santa Monica Community College District
Staff Use Only

Description of unsafe condition:

Location: **(Be specific: room #, N/S/E/W, etc.)**

Date reported: _____

Map included: Yes _____ No _____

Weather: Wet _____ Dry _____

Date inspected: _____

Pictures Taken: Yes _____ No _____

Area in compliance with codes: Yes _____ No _____

Work Order Issued: Yes _____ No _____ Work Order #: _____

Scheduled Completion Date: _____

Work Completed: _____

Repaired by: _____

Signature

Date: _____

White copy: Risk Management

Yellow copy: Health Office

Pink copy with map: Maintenance

DATE DOCUMENT REVIEWED	REVIEWED BY
2/18/20	Daniel Phillips