

REDWOODS COMMUNITY COLLEGE DISTRICT

Injury and Illness Prevention Program

INTRODUCTION

The Redwoods Community College District has developed this formal Injury and Illness Prevention Program to ensure safe and healthful working conditions for all district employees. The Injury and Illness Prevention Program is intended to standardize various safety programs and procedures into one effective, uniform program and to ensure compliance with State and Federal safety regulations.

The program has been designed with the major emphasis on the health and safety of all District employees while trying to remain viable and effective. The Program identifies District responsibilities and also defines responsibilities of the District Program Coordinator, site managers, supervisors, and all other employees. All District administrators, managers, and employees will be required to adhere to the policies and procedures set forth in this Program. However, all administrators, managers, and employees are encouraged to provide constructive criticism of the Program in the interest of periodic modifications to ensure that the Program remains one that not only espouses injury prevention but also allows for efficient implementation of all program components to achieve the desired goal of employee health and safety.

Federal and State regulations require the Injury and Illness Prevention Program for the protection of employees. While this means students are not covered by the plan it is the District's intent to extend a healthy and safe environment to our students as well as employees.

PROGRAM COORDINATOR

The District hereby assigns responsibility for the implementation and maintenance of the Injury and Illness Prevention Program to:

Kathleen E. Crabill, President/Superintendent

The President/Superintendent designates the responsibilities of Program Coordinator to the Environmental Health & Safety Manager. The Program Coordinator is responsible for ensuring that the District provides all employees with a safe and healthful workplace and that the District is in compliance with all Cal/OSHA and other applicable federal, state, and local safety and health standards.

The Vice-President, Business Services on the Eureka Campus; the Campus Vice-President, CR Del Norte; and the Campus Vice-President, CR Mendocino Coast; shall be the Assistant Program Coordinators responsible for carrying out the Injury and Illness Prevention Program on their respective campuses.

In order that the President may fulfill his or her responsibilities, the District grants appropriate authority to the President so that all District and Program obligations are met, and pledges to provide the time and resources necessary to fulfill his or her responsibilities.

PLAN REVIEW

The District is aware that the workforce and workplace safety regulations may change over time. Therefore, the Injury and Illness Prevention Program Coordinator will be responsible for reviewing the Program at least once during the first year after implementation and then at least annually thereafter.

The review will be to ensure that the written Program is appropriate for the District at the time of the review and for any anticipated future changes.

OCCUPATIONAL SAFETY & HEALTHLY WORK PRACTICES-COMPLIANCE

The District is aware that Occupational Safety and Health regulations and workplace practices are designed to reduce or eliminate employee occupational injuries and illnesses. However, the regulations and work practices are only effective if all employees faithfully abide by them. Therefore, the District, through the Program Coordinator will implement a system or systems to ensure that all employees comply with workplace safety and health practices.

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

TRAINING AND RETRAINING PROGRAMS. These are fully addressed in this Plan in the section, Employee Training.

EMPLOYEE INCENTIVE PROGRAM. An incentive program may be developed by site managers, department heads, administrators, or the Safety Committee. Incentive Programs should be approved by the Program Coordinator, Safety Committee and be incorporated as part of this plan.

EMPLOYEE RECOGNITION PROGRAM. A program which recognizes outstanding employees may be developed by site managers, department heads, administrators, or the Safety Committee. Recognition Programs should be approved by the Program Coordinator and be

incorporated as part of this plan.

DISCIPLINARY ACTION. The District believes that positive incentives are a better way to support employee compliance with workplace practices than negative sanctions. However, there may be instances where employees are found blatantly disregarding known safety rules, regulations, or workplace practices.

Employees found violating workplace safety practices or found jeopardizing the safety of any other employee, student, or visitor will be subject to disciplinary action in accordance with existing District policy. Disciplinary action will only be taken for violations of known rules, regulations, work practices, or policies. Any action taken will not violate employee rights under Cal/OSHA regulations and District Bargaining Agreements and will be enforced in a nondiscriminatory fashion.

SUPERVISORY OBSERVATIONS. Supervisors will conduct scheduled and unscheduled observations of work practices of employees under their direct supervision. These observations will be done to ensure employee compliance to safe and healthy work practices.

COMMUNICATION

Communication to employees and between employees and the District, on matters relating to Occupational Safety and Health is an important aspect of assuring the success of the District's Injury and Illness Prevention Program. Therefore, through the Program Coordinator, the District will implement a system or combination of systems intended to accomplish the following:

Provide a means for the District to readily communicate to employees, in a readily understandable form, on matters relating to Occupational and Environmental Safety and Health; and,

provide encouragement for employees to inform the District of workplace hazards without fear of reprisal.

The communication portion of this Program will consist of any one or more of the following:

TRAINING AND RETRAINING PROGRAMS. Training programs are considered a key component of the communication system. These programs are fully address in this plan in the section, Employee Training.

MEETINGS. Meetings will be a part of department safety functions. each department head or manager will inform the Program Coordinator of the type and frequency of manager/supervisor and employee safety meetings. These meetings will be intended as a brief session to discuss one

or more safety items and encourage open discussions between employees and the District.

Documentation will be kept of each meeting. This documentation will include a minimum, the following:

- meeting topic(s),
- any recommendation agreed upon during the meeting which may improve workplace safety,
- list of attendees,
- date of meeting,
- time and length of meeting.

Each manager/supervisor conducting meetings will maintain a file of the meetings documentation and also submit a copy to the Program Coordinator.

SAFETY COMMITTEE. The District Safety Committee is considered an important part of the overall system of communication. The committee will include at all times representation from management, classified personnel and certificated personnel. The recommended committee make-up should include representatives from the following:

- Program Coordinator (Chair),
- Director, Facilities and Grounds,
- Del Norte Campus Representative,
- Mendocino Coast Campus Representative,
- Public Services/Security,
- Disabled Student Services,
- CRFO Representative,
- CSEA Representative,
- ASCR Representative.

Each area represented will also name an alternate member to ensure that all areas are fairly represented at each meeting. The Safety Committee should set its own rules as to quorum and other procedural rules.

The Safety Committee will do all things necessary to ensure that at least the following are met:

- The committee meets regularly, but not less than quarterly.
- Minutes are prepared for each meeting showing all agenda items. Minutes shall be available to all upon request. Minutes shall be retained by the Program Coordinator for a minimum of three years.
- Minutes of the Safety Committee shall be available to Cal/OSHA upon request.
- Review the results of all periodic workplace inspections.
- Review reports of investigations of occupational accidents and causes of any incident

resulting in injury, illness, or exposure to hazardous substances. Where necessary or appropriate, the committee will submit suggestions to management for the prevention of future incidents.

Review investigations of alleged hazardous conditions brought to the attention of the Safety Committee.

When deemed necessary by the committee, conduct its own inspections and/or investigations to assist in remediation any hazardous condition or practice made known to the Safety Committee.

Submit recommendations to assist in the evaluation of employee safety suggestions.

Communicate with Cal/OSHA when requested by the Division to verify abatement action taken by the District pursuant to Division citations.

Employees serving on the Safety Committee shall be informed that they and the Committee will not be held liable for any act or omission in connection with the Safety Committee.

ANONYMOUS NOTIFICATIONS. To further encourage employees to report unsafe conditions or practices, the District will implement a system which promotes anonymous notifications. The Program Coordinator will develop appropriate methods and means for receipt and action of anonymous notifications. All anonymous notifications will be submitted to the Safety Committees for resolution.

MISCELLANEOUS. When appropriate, the District may use written communications such as inter-district memos, envelope stuffers, newsletters, and postings to supplement previously described systems to further communicate to employees workplace safety and health.

IDENTIFICATION & EVALUATION OF WORKPLACE HAZARDS

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

Workplace inspections will be scheduled to meet the following minimum requirements:

An initial inspection when a program or facility 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 hazards; and

An inspection of affected areas whenever the District is made aware of a new or previously unrecognized hazard.

To ensure workplace hazards are identified and evaluated on a regular basis, periodic inspections

will be scheduled as follows:

BY DISTRICT PERSONNEL

As a matter of course all District staff will be observant for safety hazards in their normal coming and going about the campus. Easily remedied hazards such as rocks on pathways will be immediately corrected. More serious hazards or those that require specialized personnel will be reported immediately to Maintenance personnel or the Program Coordinator.

BY OUTSIDE SAFETY EXPERTS

District personnel perform routine workplace inspections, but usually they are not considered safety experts. Therefore, when necessary, the District will use outside safety experts to supplement the District's in-house Inspection Program. If outside safety experts are used, they must meet and adhere to the following:

- Provide evidence of being a safety expert such as membership in the American Society of Safety Engineers, Registered Professional Engineer, Certified Safety Professional, or other recognized designation.
- Demonstrate experience with educational institutions.
- Provide proof of liability insurance.
- Submit reports to designated District personnel.
- Agree to maintain copies of all submitted reports for a minimum of three years as back-up to District records.

OTHER EVALUATIONS

Job Safety Analysis (JSA), ergonomic studies, and the like may be used to supplement scheduled periodic workplace inspections. The Program Coordinator shall be responsible for reviewing and analyzing accident reports and "near miss" reports to identify trends, high frequency, and high severity exposures. This analysis with supporting data from safety/risk management resources shall be used to determine when JSAs, ergonomic studies, or other steps are appropriate to aid in identifying and evaluating workplace hazards.

CORRECTIONS OF UNSAFE OR UNHEALTHY CONDITIONS

When unsafe or unhealthy conditions are recognized immediate steps will be taken to abate, eliminate, or correct the situation through the use of:

Employee Safety and Health Training;
Maintenance workorders to correct the problem; or
Remove equipment from service.

The Program Coordinator, Safety Committee, Director of Facilities and Grounds, Vice President, Business Services, and Campus Vice Presidents shall determine the appropriate corrective action to abate, eliminate, or correct the identified conditions.

Priorities for correction will be based on the severity of the hazard when observed or discovered. Priority will always be given to safeguarding employees and students from serious injury or illness. If a hazard is discovered which poses an imminent danger to employees or students and the hazard cannot be immediately abated, mitigated or corrected without endangering personnel, then all exposed personnel and students will be evacuated to a safe distance. Employees remaining to correct the hazardous condition may do so only if they are properly trained and safeguarded and are fully aware of the condition and precautions necessary to protect themselves.

Managers and supervisors must notify the Program Coordinator as soon as possible after the discovery of a concealed hidden danger. If immediate corrective action cannot be implemented to abate, mitigate or correct the concealed danger, then notification about the hazard shall be given to all employees and students having the potential for exposure to the concealed hazard.

All work orders generated by the Program Coordinator; Director of Facilities and Grounds; Vice President, Business Services; or Associate Vice Presidents to correct unsafe or unhealthful conditions shall be given the highest priority.

INVESTIGATIONS OF OCCUPATIONAL INJURY, ILLNESS OR EXPOSURE TO HAZARDOUS SUBSTANCES

Investigation of any occupational injury, illness, or exposure to hazardous substances may be necessary to meet the following:

legal obligations to the State or Cal/OSHA,
requirements of the Workers' Compensation Insurance Program,
provide an effective technique for the prevention of recurring or future accidents.

Procedures for investigations of occupational injury, illness or exposure to hazardous substances will cover the following:

what should be reported,

who does the initial investigation,
who does the follow-up investigation,
who receives copies of the report,
when legally required reports must be completed.

The procedures will be applied as necessary depending on the nature of the accident situation.

WHAT SHOULD BE REPORTED? Employees are required to report every accident or incident as soon as possible to their immediate supervisor. Reporting should be done regardless of the extent of injuries or even in the absence of injuries. "Near-miss" accidents should also be reported as they are an indication that something is wrong. All accidents resulting in injury to an employee must be reported to the Program Coordinator and Human Resources the day of the injury or at the latest the next working day after the injury.

INITIAL INVESTIGATIONS. The immediate or department supervisor will be responsible for conducting the initial accident or incident investigation. The initial investigation must include at least the following information:

Name of the injured or involved employee(s),
Employee information,
% Age
% Sex
Employee occupation,
Date and time of accident or incident,
Location of accident or incident,
Description of accident or incident,
Acts or conditions contributing to the incident,
Nature and description of any personal injuries,
Recommended corrective action,
Additional remarks, sketches or photos as appropriate.

FOLLOW-UP INVESTIGATION. The Program Coordinator and Safety Committee shall review all initial investigation reports. The Program Coordinator or Safety Committee (or selected members) will conduct follow-up investigations when their review suggests that one is appropriate. Follow-up investigations are required for any accident which requires reporting to Cal/OSHA or results in a Worker's Compensation claim.

COPIES OF INVESTIGATIVE REPORTS. The supervisor completing the report shall keep a copy in department files. The supervisor completing the report shall also provide copies of the report to the following:

Appropriate department manager or chairperson,
Program Coordinator,

Human Resources.

LEGALLY REQUIRED REPORTS. A serious injury or illness is any injury or illness occurring in the place of employment or in connection with any employment which requires inpatient hospitalization for a period in excess of 24 hours for other than medical observation, or in which an employee suffers a loss of any member of the body, or suffers any serious degree of permanent disfigurement.

Any serious injury or illness, or death of an employee occurring in a District workplace or in connection with any District employment must be reported to the Program Coordinator and Human Resources immediately or as soon as practically possible, but not greater than 8 hours, so as to ensure timely Cal/OSHA notification. The following information must be given to the Program Coordinator and/or Human Resources:

- Time and date of the accident,
- Name and title of the person reporting the accident,
- Address of the accident site,
- Name of person to contact at the accident site,
- Name and address of the injured employee(s),
- Nature of the injury,
- Location where the injured employee(s) was (were) moved to,
- Identity of any law enforcement agencies present at the accident site,
- Description of the accident and whether the accident scene has been altered.

For any occupational injury or illness which results in lost work time of at least a full day or shift beyond the date of occurrence, or which requires medical treatment beyond first aid, the Program Director will complete the "Employer's Report of Occupational Injury or Illness," Form 5020.

There are a number of accident situations which may require investigative action. Each situation may call for varying degrees of investigative procedures.. Following are the most probable accident scenarios with the appropriate District procedures to implement.

"NEAR-MISS" ACCIDENT. There is no accident and no injury; however, an accident nearly occurred. The following actions are required:

- The incident is reported too the supervisor.
- The supervisor shall conduct an initial investigation and distribute reports according to procedures.
- The supervisor shall conduct a meeting with employees to review the investigation results and discuss preventive measures.

ACCIDENT OCCURS - NO INJURIES. Although there are no injuries, an accident with the potential for injuries has occurred. Use the same actions as for a "near-miss" accident.

ACCIDENT OCCURS - SLIGHT INJURIES. An accident has occurred with slight injury to an employee(s). The injured employee(s) required only first aid and the returned to work immediately. The following actions are required:

The incident is reported to the supervisor, Program Coordinator, and Human Resources. The supervisor shall conduct an initial investigation and distribute reports according to procedures.

The supervisor shall conduct a meeting with employees to review the investigation results and discuss preventive measures.

The injured employees shall be provided with an "Employee's Claim for Worker's Compensation Benefits."

If first-aid was provided by a physician, the Program Coordinator or Human Resources should ensure that a "Doctor's First Report of Occupational Injury or Illness" is completed.

ACCIDENT OCCURS - MODERATE INJURIES. The accident results in injuries that requires medical treatment beyond first aid or results in the employee missing at least a full day of work beyond the date of the occurrence. This is considered a recordable (lost-time accident) injury and the following actions are required:

The incident is reported to the supervisor, Program Coordinator, and Human Resources. Completion of the "Employer's Report of Occupational Injury or Illness," Form 5020.

The supervisor shall conduct an initial investigation and distribute reports according to procedures.

The supervisor shall conduct a meeting with employees to review the investigation results and discuss preventive measures.

The injured employee shall be provided with an "Employee's Claim for Worker's Compensation Benefits."

ACCIDENT OCCURS - SERIOUS INJURY OR DEATH. The following actions are required:

The incident is reported to the supervisor, Program Coordinator, and Human Resources. Cal/OSHA is notified immediately by telephone.

Completion of "Employer's Report of Occupational Injury or Illness," Form 5020.

The supervisor shall conduct an initial investigation and distribute reports according to procedures.

The supervisor shall conduct a meeting with employees to review the investigation results and discuss preventive measures.

EMPLOYEE TRAINING

The District will implement and maintain an Occupational Safety and Health Training Program for all employees. The training program is intended to train and instruct employees in general safety and healthy work practices and to provide instruction regarding hazards specific or unique to each employee's job.

The Program 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.

To ensure that all employees receive adequate training, the training program will include the following elements:

All employees will receive training and instruction when the Injury and Illness Prevention is first established.

All new employees will receive appropriate training prior to assignment.

All employees given new job assignments will receive training applicable to new exposures for which training had not been previously provided.

All employees exposed to new hazards due to the introduction of new substances, processes, procedures, or equipment to the workplace will receive training and instruction applicable to the new hazards.

Employees will receive refresher training whenever the Program Coordinator or Safety Committee is made aware of new or previously unrecognized hazards, when the District believes it is appropriate, or as regulations dictate.

Training and instruction will be provided in any format or method approved by the Program Coordinator and/or Safety Committee and which is readily understandable to all employees. Training formats and/or methods may include but not limited to:

Seminars,
Workshops,
Manuals,
Booklets,
Video, film or other visual media,
Meetings.

The Program Coordinator will ensure that all training and instruction provided under the Injury and Illness Program is documented. Employees attending or receiving training mandated by this Program may be requested to sign an attendance sheet. As identified in State regulation some training programs must show that employees have successfully completed training programs. In these instances, employees will be required pass a test or otherwise demonstrate successful completion of the training. Supervisors and employees who reuse or fail to attend or participate

in District sponsored training will be subject to disciplinary procedures under existing District policy.

To ensure that employees receive complete training and instruction, general safety and health training will include but not necessarily be limited to the following:

- General safe work practices,
- Access to exposure and medical records,
- Emergency Action Plan,
- Fire Prevention Plan,
- Portable fire extinguishers,
- Employee/building occupant alarm systems.

Examples of information and training which may cover hazards unique or specific to individual jobs may include but not be limited to the following:

- Standard operating procedures for specific equipment of jobs,
- Servicing of single, split and multiple rims or wheels,
- Personal safety devices and safeguards,
- Industrial trucks including forklifts,
- Power operated presses,
- Gas systems for welding and cutting,
- Noise - when noise levels are at or exceed 85 dB over an eight hour TWA,
- Respiratory protective equipment,
- Airborne contaminants,
- Confined spaces,
- Changing and charging storage batteries,
- Hazard Communication,
- Asbestos,
- Regulated Carcinogens,
- Lead exposures,
- Lockout/tagout procedures,
- Excavation and trenching,
- Self-propelled aerial work platforms or devices,
- Emergency Planning - Hazardous Waste Operations & Emergency Response,
- Ergonomics,
- Occupational exposure to hazardous chemicals in laboratories.

If deemed appropriate by the Program Coordinator and the Safety Committee, the District may develop and implement programs to cover first aid and fire brigades. If either one or both of these programs are implemented, then employees participating shall receive appropriate training.

RECORD KEEPING

Record keeping of essential data is important as it documents critical activity taking place as part of the Injury and Illness Prevention Program. Record keeping will be mandatory for the following:

- Workplace inspections,
- Employee Occupational Safety & Health Training,
- Occupational Injuries and Illnesses.

The Program Coordinator will be responsible for ensuring that all relevant records are completed and kept as required by this program and/or Cal/OSHA. The record keeping activities may require the involvement of other departments such as Human Resources.

Workplace inspection records shall be kept for all scheduled, periodic inspections. These records will include at a minimum:

- Date of inspection,
- Work areas inspected,
- Name of the person(s) conducting the inspection,
- The unsafe conditions and work practices which have been identified,
- Action taken to correct the identified unsafe conditions..

Personnel records shall be kept for all Safety and Health Training provided to employees. These records shall be kept for each employee and will include at minimum:

- Employee name,
- Date of training,
- Type of training provided,
- Training provider(s).

Records shall be maintained of all occupational injuries and illnesses. The records log will meet the following requirements:

- The records will be maintained as deemed appropriate by the Program Coordinator,
- Where required, records will be maintained in accordance with law or
- Records will be retained as per law or regulation or as deemed appropriate by the Program Coordinator.

Appendix A

CalOSHA Inspection Policy and Procedures

It is the policy of College of the Redwoods to permit inspections and cooperate with representatives of California Occupational Safety and Health Agency (CalOSHA). It is critical that employees who respond to the CalOSHA inspector are able to provide evidence of the necessary safety programs; show genuine interest in, and concern about the issues of the inspector's visit; and demonstrate a determination to immediately correct any problem that exists. CalOSHA inspections shall be accomplished in accordance with the following procedures:

1. Upon arrival the CalOSHA inspector will be directed to the designated campus representatives, the "key persons." Key persons for the Eureka Campus are Bill Connors, Joe Porras, and Tim Flanagan. At the Arcata Instructional Site the key person is Michelle Henson. At the Del Norte Campus the key persons are Dave Throgmorton and Lynda Hays. At the Klamath-Trinity Branch Campus the key person is DaVita Copeland. At the Mendocino Campus the key persons are Judith Kvinsland and Linda Turner.
2. The inspector should be treated cordially and invited to await the key person.
3. The inspector will commence with an opening conference. This conference will reveal the basis for the inspection and those locations to be inspected. The inspector will ask for permission to inspect, grant permission, otherwise the inspector will return with a court order to inspect and be very displeased.
4. Try to limit the inspection to those areas requested by the inspector. Use the most direct route to the area the inspector wants to see. However, a CalOSHA inspector has the right to conduct an inspection of the entire facility.
5. The key person should accompany the inspector throughout the inspection. The only exception to this is if the inspector desires to speak with an employee in private.

Employees have the right to speak with the inspector in private. If the employee does not object the key person may listen in unless the inspector objects.

6. Throughout the inspection the key person should respond to questions posed by the inspector. If the key person is unsure of an answer, state the lack of information, do not speculate or volunteer information not directly requested, as any statements made can be considered authorized and factual admissions, and therefore, admissible as evidence in a later judicial proceeding. Answer questions courteously, but concisely. In depth answers can unnecessarily prolong the interview and reveal information not pertinent to the scope of the inspection or expand the scope of the inspection.

7. Never admit a violation.

8. During the inspection, the inspector is authorized to take samples and/or pictures. If this occurs the key person should collect the same samples and pictures.

9. Upon completion of the inspection, the key person should request a closing conference. It is advisable that more than one district employee attend the closing conference to insure that all the inspector's comments are clearly understood. If citations are issued, determine which safety orders were allegedly violated. This conference is not a forum to dispute citations; however do not make any admissions or concessions regarding liability.

10. Immediately after the departure of the inspector the key person should prepare a report of the inspection incorporating any notes, photos, samples, names of persons interviewed, etc. The Environmental Health & Safety manager should be notified immediately.