

# INJURY & ILLNESS PREVENTION PROGRAM (IIPP)

2023-24

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## **HEALTH AND SAFETY POLICY STATEMENT**

The primary function of schools is to educate the children of our community. However, it is very important for all employees to enjoy a safe work environment. The personal safety of each employee while in the performance of his or her work activity is a top priority of the San Luis Obispo County Office of Education (SLOCOE).

SLOCOE is committed to providing funds for risk management programs of safety activities, employee training, environmental testing, and purchase of safety equipment. These funds ensure that all employees have the opportunity to be informed and trained in the highest standard of safe work practices and practices that will lead to improved wellness and safety away from the job. This is a shared responsibility for all employees working for SLOCOE.

The Health Management and Safety Committee will assist supervisors, site administrators, and employees in creating a climate of safety awareness. This requires open lines of communication where employees have the opportunity and are eager to participate in safety programs. Employees are encouraged to voice concerns about hazards or potential hazards without fear of reprisal.

#### **OVERVIEW**

The California Code of Regulations (CCR), Title 8, Section 3203, requires employers to maintain a safe and healthful workplace for employees. These regulations are enforced by the California Occupational Safety and Health Administration (Cal/OSHA). The regulations require a written Injury and Illness Prevention Program (IIPP) to specify responsibilities and general procedures to protect employees and reduce losses resulting from injuries and illnesses. This IIPP has been developed to provide organizational structure and procedures to assure there are effective programs in place to identify and mitigate actual and potential hazards to the safety and health of SLOCOE staff, volunteers, and visitors.

It is the position of the San Luis Obispo County Office of Education (SLOCOE) that most accidents are preventable and it is our goal to anticipate and reduce accident producing behaviors and conditions at our facilities. The district, through its administration and management, is committed to the safety of all employees and recognizes the need to identify hazards and prevent employee injuries, accidents to promote employee safety. All employees, including supervisors and site administrators, share responsibility for providing a safe working environment. All departments and their staff should actively identify and manage risk exposure related to each individual's job environment. This requires that SLOCOE facilities be maintained and operated in strict compliance with all applicable health and safety regulations.

This document is intended to assure compliance with Title 8 CCR Section 3203, and defines general and specific workplace safety responsibilities and procedures for all employees.

#### RESPONSIBILITIES

Safety and health is the responsibility of every individual working for SLOCOE. Knowledge and use of safe work practices, and reporting and correcting unsafe conditions and unsafe behaviors, are the most effective ways to prevent injuries. All employees are responsible for reporting all injuries and newly identified hazards to their supervisors. All employees are authorized and expected to correct unsafe conditions when observed, if they can do so without risk to themselves or others.

## **Program Administration**

The ultimate responsibility for implementation and oversight of the San Luis Obispo County Office of Education IIPP rests with the County Superintendent of Schools. The superintendent will meet this responsibility by providing the necessary support for the execution and administration of the SLOCOE IIPP. The actual administration of this program is designated to the Program Administrator.

Program Administrator: Title: Hugo Bastidos Contact Information: Director of

Operations /Safety Coordinator 3350 Education Drive, San Luis Obispo, CA 93405 (805) 782-7257

hbastidos@slocoe.org

#### Responsibilities Include:

- Advising senior management and the County Board of Education on safety and health issues
- Working with senior management to develop safety and health guidelines and policies
- Preparing and distributing the SLOCOE's guidelines, policies and procedures on safety and health issues
- Interpreting and maintaining current information on local, state and federal safety and health regulations
- Serving as liaison to governmental agencies
- Planning, organizing and coordinating safety trainings
- Arranging for safety and health inspections, and follow-up to insure necessary corrective action is completed
- Establishing, conducting and maintaining an accident reporting and investigation procedure
- Taking action to mitigate identified safety hazards, including any temporary measures, as appropriate
- Coordinating with Human Resources department to maintain injury and illness records
- Reviewing injury and illness trends

- Establishing and overseeing the actions of the Health Management & Safety Committee
- Periodically reviewing the IIPP for effectiveness and relevance
- Establishing a system for maintaining the records of inspection, hazard abatement, and training

## **Supervisors / Site Administrators**

Supervisors and site administrators have overall responsibility for ensure site conditions and operations are in strict compliance with applicable health and safety requirements. In addition, they are responsible for enforcing safe work practices and mitigating identified hazards. Other responsibilities include:

- Providing new employees with an orientation regarding job hazards and safe work practices associated with their defined duties prior to assignment, including the use of personal protective equipment.
- Implementing and maintain the IIPP at each site and answer workers' questions
- Investigating and documenting accidents and taking necessary action to prevent recurrence
- Discussing recent accidents, injuries, or "near-miss" occurrences
- Recommending disciplinary action for employees failing to comply with safety requirements
- Ensuring employees are trained on safe work practices, how to use equipment that is provided, and any hazards unique to their work areas or duties
- Consistently enforcing all safe work practices
- Instructing and ensuring proper reporting of work-related injuries and illnesses
- Informing employees on procedures for reporting work place hazards and safety concerns
- Responding to all reports of unsafe conditions or unsafe acts reported by employees
- Conducting monthly safety meetings
- Notifying the program administrator of new operations, equipment, and safetyrelated exposures
- Allocating time for health and safety training
- Reporting potential workers' compensation claims and continuing contact with injured employees
- Documenting safety meetings, training, and maintaining employee training records

# **Employees**

Employees are responsible for following safe work practices and procedures as referenced in this document and by their respective department or supervisor. All employees should adhere to the following safe practices:

- Understand and comply with all applicable, job safety procedures
- Understand that no employee is expected to undertake a task until the employee
  has received instructions or training on how to perform the task properly and

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- safely, and has been authorized to perform the job.
- Understand that no employee should use chemicals they are unfamiliar with
- Understand that mechanical safeguards must always be in place during operations
- Report unsafe conditions, work practices, "near-miss" occurrences, and accidents to a supervisor immediately
- Utilize appropriate personal protective equipment as instructed by a supervisor
- Report and correct workplace hazards as they are discovered
- Attend and participate in monthly safety meetings
- Promote safety in the workplace

## **Health Management & Safety Committee**

The Health Management and Safety Committee is responsible for reviewing accident reports, workplace safety concerns, and wellness issues; promoting safety awareness; and providing safety communications throughout the county office. Other responsibilities include:

- Reviewing work-related injury and illness reports and statistics
- Overseeing the SLOCOE safety incentive program
- Making recommendations to the Program Administrator, supervisor, or site administrator on necessary corrective actions where necessary
- Conducting and/or reviewing periodic site inspections
- Making available the meeting agendas and minutes to all employees
- Reviewing the IIPP annually and recommending necessary revisions to the Program Administrator

# **Safety Coordinator**

The Safety Coordinator is responsible for advising supervisors and site administrators on regulatory requirements, and for conducting periodic site inspections to assess compliance with applicable standards. Other responsibilities include:

- Developing policies and procedures for workplace safety
- Assisting supervisors in preparation, implementation, and maintenance of the IIPP
- Conducting studies to evaluate potential workplace hazards, including exposure to chemical, physical and biological agents
- Compiling and disseminating injury and illness statistics
- Evaluating factors contributing to workers' compensation claims and preparing corrective action plans to reduce loss potential
- Recommend corrective action following routine site inspections
- Preparing health and safety training materials and providing training as requested

#### COMMUNICATION

The IIPP will be effective in preventing injury and illness only if there is clear and open communication on safety matters. Supervisors and managers are responsible for communicating with all employees assigned to their areas of responsibility about safety and health in a form readily understandable by everyone on a consistent basis. Ongoing

communication about safety and health topics, workplace hazards, and recent injuries or incidents is important because it keeps safety in the minds of everyone. Communication occurs in a variety of ways. Our system allows employees to inform their supervisors about workplace hazards or concerns without fear of reprisal.

- 1. Each site supervisor or department manager will ensure the location of the IIPP is known and accessible to all employees. New employees must be oriented on the contents of the IIPP, in addition to general and specific safety topics. This new employee orientation is generally provided within 30 days of employment by Human Resources, and includes information on safety and health policies and procedures. The orientation should be documented using the *Training Attendance Log* (or other appropriate form) and a copy retained in the employee's personnel file.
- 2. The site supervisor/department manager will disseminate safety-related information provided by the district during monthly safety meetings. This information is disseminated during staff meetings, posted on staff bulletin boards, and via email. Additional safety training program information is conveyed as required to address actual or potential employee hazards or exposure.
- 3. The site supervisor/department manager will encourage employees to inform any supervisor or manager of actual or potential workplace hazards. Supervisors and managers are expected to inform all employees on the procedures for reporting hazards and such reporting will not result in disciplinary action. Employees may also report unsafe conditions or work practices to the Program Administrator or Safety Coordinator at (805) 782-7257. Employees may access and download a <u>Safety Concern/Suggestion form</u>. The form may be completed and submitted to their supervisor.
- 4. The Health Management and Safety Committee meets at least eight times each year to discuss such items as recent accidents and injuries, safety compliance, identified hazards, safety suggestions, safety equipment, and other issues related to safety. The committee is composed of management, classified, and certificated employees, and each site or department has at least one representative to disseminate the information to other staff. Occasional safety newsletters, safety and health bulletins, and hazard alerts are sent out with additional information.

### **COMPLIANCE**

All employees of SLOCOE are responsible for complying with established safe work practices. Supervisors and site administrators are responsible for ensuring employees are aware and understand all applicable practices and procedures, and enforce them fairly and uniformly in their areas of responsibility. Our system of ensuring that all workers comply with applicable procedures and practices includes:

Safety Incentive Programs – rewarding and recognizing employees that participate
in the safety program, and use safe procedures to complete their work. Incentives
include "Caught In the Act"; an online training program sponsored by SIPE (Schools
Insurance Program for Employees), a monthly Fitness Challenge, Safety Module

- online training, and Self-Inspection initiative.
- Disciplinary Action Willful or negligent non-compliance with SLOCOE IIPP will result in written reprimands and/or verbal counseling, and will be documented by supervisors/ site administrators. All disciplinary action will be pursuant to SLOCOE personnel policy. Repeated written reprimands for serious offenses may result in discipline up to or including termination.
- Safety Performance Evaluations Employee safety performance reports under the section regarding "Safety Practices" will reflect the employee's safe working procedures.
- Knowledge that unsafe conditions or practices can be reported without fear of reprisal. A "Safety Report" form can be completed and sent anonymously to the Safety Coordinator or Program Administrator.
- Training and Retraining Programs
- Awareness of, and adherence to the provisions set forth in the SLOCOE IIPP.

## HAZARD IDENTIFICATION, ASSESSMENT AND CONTROL

Hazard identification and assessment is an ongoing process and fundamental to the effectiveness of the IIPP. SLOCOE conducts scheduled formal and unscheduled informal inspections on the interior and exterior of all of its facilities. These inspections form the basis for the identification of new or previously unrecognized hazards around all SLOCOE sites.

Procedures are in place to assess and control hazards when identified. SLOCOE conducts at least one self-inspection each year on the interior and exterior of each site or facility. Inspections are documented on a general inspection checklist and these findings are processed by the Operational Services Department into work orders so that appropriate action can be taken to correct each hazard or finding in a timely manner.

If a hazardous condition or activity presents an immediate danger of injury or accident, the situation should be reported to a supervisor as soon as possible and the area secured to prevent entry or access. The safety coordinator should be contacted immediately to discuss the situation and decide how to make the situation safe.

- Supervisors, site administrators, or designees are expected to conduct a brief daily survey of their area of responsibility to identify any new unsafe conditions and take action to ensure correction. Corrective action may be taken by facility staff or if necessary, the Operational Services Department should be contacted for assistance.
- The Program Administrator will ensure that all reported potential safety hazards left unabated are documented using the district work order system for the purpose of facilitating necessary corrective action.
- 3. Employees are encouraged to continually assess their work environment for hazards, inspect their tools and equipment before use, be aware of other safety issues and report any problems in writing to their supervisor.

- 4. Supervisors and site administrators are responsible for ensuring that identified hazards are corrected in a timely manner. When an imminent hazard is identified which cannot be immediately abated without endangering employees, all nonessential personnel will be removed from the affected area and the area secured to prevent re-entry except for designated workers.
- 5. Additional inspections are conducted when:
  - New substances, processes, procedures or equipment which present potential new hazards are introduced into our workplace
  - New, previously unidentified hazards are recognized
  - When injuries or illnesses occur
  - Anytime workplace conditions warrant an inspection

Key areas of exposure to potential injury and illness for employees include:

- Repetitive motion or cumulative trauma related to office environmental duties
- COVID-19 or Pandemic outbreaks
- Driving school buses, SLOCOE vehicles and personal vehicles while on duty
- Vehicle or machine fueling operations
- Student encounters
- Uneven walking surfaces or elevation changes in walking surfaces
- Ladder use
- Power and hand tool use
- Forklift operation
- Aerial lift operation
- Chemical use
- Pesticide application
- Material handling and usage
- Lifting/transferring students
- Noise-producing equipment or machines
- Blood borne pathogens/medical waste
- General office area hazards
- Kitchen-related activities
- Tree work maintenance and removal
- Environmental wild animals, insects, and poisonous plants
- Inattention to surroundings

## **ACCIDENT INVESTIGATION**

Supervisors and employees are required to follow the district's *Injury and Illness Reporting Procedures* when an incident occurs. Reports of occupational injury, illness, or near-misses will be investigated by the supervisor or site administrator and documented using the appropriate district form. Incidents resulting in serious injuries or those that had the potential for serious injury will be referred to the district safety coordinator for immediate investigation. Depending on the severity or potential severity, a third-party investigator may provide assistance in the investigation.

The primary reason for conducting an accident investigation is to determine the root cause

of the incident and thus prevent future similar incidents through the use of knowledge derived from the investigation. Administrative and supervisory personnel are responsible for accident investigation in their areas of responsibility. Supervisors are required to accurately complete a <u>SIPE Accident Investigation Report</u> with the employee as soon as possible after the incident. Upon completion, the report is forwarded to the appropriate District personnel for further review.

In addition to the above investigation and documentation of the findings, the safety committee will review the basic information for each incident and make additional recommendations for corrective action when appropriate.

## **Corrective Action**

Correcting and controlling hazards discovered in the workplace is everyone's responsibility and is the cornerstone of an effective IIPP. Upon completion of an accident investigation or discovery of a workplace hazard, corrective action will be taken by the appropriate party to eliminate or control the hazard if one exists. The action taken can be completed and documented at the time of the investigation or discovery or a SLOCOE maintenance work order can be filed for action by the proper personnel. For conditions where appropriate corrective action cannot be determined, supervisors and site administrators will consult the safety coordinator, safety committee, SIPE, or another qualified consultant or individual to develop appropriate corrective action. If an imminent hazard is found, supervisors will remove all personnel from the area and contact the safety coordinator for further guidance. For identified hazards that are not considered to be an imminent danger, a priority list of corrective action items will be determined.

Documentation of corrective action is maintained in the work order system or on the written accident investigation forms.

SLOCOE uses an on-line database to manage work orders. Hazards or other safety issues documented using the work order system will specify the problem and indicate the type of corrective action needed. Employees using the system for the first time should contact Operational Services for instructions at 805-782-7251. Thereafter, employees should ensure that a maintenance work order is entered to address the concern. Emergency work orders where an imminent hazard exists should first be reported verbally to Operational Services at 805-782-7251. (The term "Emergency" denotes a situation in which property damage, injury or loss of life may result without immediate action.)

# **Training and Instruction**

 Proper employee safety training and instruction is crucial for maintaining a safe and healthy workplace. It is the intent of SLOCOE to fully train and inform all employees in their respective areas of employment, including general and job-specific safety and healthy work practices. All supervisors and site administrators are responsible for ensuring the appropriate training of his or her employees takes place. The training provided should be appropriate for each position based on the job description and expected exposures. It should address the specific hazards associated with their tasks and the proper precautions necessary to protect them from potential hazards. Training will also include the contents of the IIPP and their responsibilities for safety under the program. All training should be documented on a <u>SLOCOE Safety Meeting Sheet</u> that indicates the subject, training provider, location, and date. This documentation is kept in the employees training file for a minimum of three years. Copies of all training records and safety training sign-in sheets should be forwarded to the safety coordinator.

#### Training will be provided when:

- An employee is first hired. General safety rules are covered in the Employee Safety Handbook.
- A new safety program is established
- An employee is given a new job assignment for which training has not previously been given.
- SLOCOE is made aware of a new or previously unrecognized hazard
- A new substance, process, procedure, or equipment is introduced into the workplace and represents a new or potential hazard
- Required by a local, state or federal regulatory agency

Supervisors should be familiarized with the safety and health hazards to which employees under their immediate direction and control may be exposed. The program administrator will ensure that all supervisors and site administrators are knowledgeable of those hazards and ensure they receive additional training as required. Safety training is accomplished through formal in-person training, monthly staff meetings, online safety training modules, and informal safety briefings.

Employees are required to complete various on-line training modules on a regular basis. The online modules will be tailored to each job description within SLOCOE. Employees are also encouraged to take additional safety modules to increase their safety knowledge.

## **RECORD-KEEPING AND DOCUMENTATION**

Actions taken to implement and maintain the IIPP are documented and maintained by the Human Resources department, supervisors, site administrators, and the safety coordinator. Records are kept for a minimum of three years and specifically include:

- Site safety inspections
- Safety training sign in sheets
- Online training database documents
- New hire orientation documents
- Safety concern/hazard reports
- Corrective actions
- Near-miss reports
- Injury/accident investigations
- Safety committee minutes and agendas

Plan or Program	Required Yes or No
Injury and Illness Prevention Program	YES
Safe School Plan	YES
Emergency Response Plan	YES
Asbestos Compliance Plan and Asbestos Management Plan	YES
Integrated Pest Management Program	YES
Bloodborne Pathogen Exposure Control SIPE Training Module	YES
COVID-19 & Virus Outbreaks (Addendum)	YES
Hazard Communication Program	YES
Lead Paint Management Program SIPE Training Module	YES
Confined Space Entry Program	YES
Respiratory Protection Program	In progress
Lockout / Tag out Program	YES
Ergonomic Evaluations	YES
Departmental Monthly Safety Meetings	YES
Active Shooter Training (ALICE) / RAVE Application Use	YES
Natural Disaster Training and Drills	YES
Workplace Violence Prevention Plan	YES