

## SECTION A

### INJURY AND ILLNESS PREVENTION PROGRAM

#### 1.0 POLICY

The personal safety of each school district employee while in the performance of his or her work activity is of primary importance to the school district. The prevention of occupational induced injuries or illnesses will be accomplished through an Injury & Illness Prevention Program at each district element. This program will ensure, to the greatest extent possible, compliance with both legal requirements and the highest standards of safe work practice. The success of this program is to be achieved through the continuous mutual cooperation and support of management and employees.

#### 2.0 GENERAL

2.1 Each Injury and Illness Prevention Program will include, as a minimum, the following elements; management support; identification, evaluation, and control of safety hazards; employee and management education; routine inspections; accident investigation and analysis; record keeping, and routine safety meetings.

2.2 Management support and participation in all elements of the Injury & Illness Prevention Program are of paramount importance. The supervisor is the key person to implement and enforce this program.

2.3 Identification, evaluation, and control of safety hazards. The employer has conducted a comprehensive safety and health audit to identify and evaluate job hazards. Action plans were developed to guide the audit. Included at the end of this document and made a part of it are copies of the action plans and worksheets on which the results of the audit are recorded. The following activities have been undertaken in connection with the audit:

2.3.1 **Review of safety orders and other regulations:** The implementation officers or their designees have reviewed safety orders, regulations, and industry standards applicable to the processes, equipment, materials, and procedures used at this worksite in order to evaluate whether hazards are present.

2.3.2 **Review of internal records and information:** The implementation officers or their designees have reviewed internal records of accidents, injuries, occupational illnesses, near-miss incidents, and safety violations to detect relationships between job hazards and recorded mishaps.

- 2.3.3 **Review of outside sources:** The implementation officers or their designees have reviewed state and federal accident and illness statistics, highlighting areas that may uncover hazards in this organization. The statistics that were reviewed are filed in the SIPE Safety Office.
- 2.3.4 **Job hazard analyses:** The implementation officers or their designees have made analyses of representative jobs to determine what hazards exist in connection with the procedures, processes, materials, and equipment used to perform them. The results of these analyses were recorded in writing, and the records are filed in the personnel office. Job hazard analysis and code of safety practices for job classifications associated with school districts are identified in Section S of this Injury and Illness Prevention Program.
- 2.3.5 **Inspection:** The employer has a program of regularly scheduled inspections. Inspections are conducted using checklists designed to uncover job hazards. Inspection records are retained for three years and are stored in the supervisors office.
- 2.3.6 **Employee reporting:** Employees are instructed to report any and all safety hazards which they may observe or become aware of. The employer uses a specified hazard reporting form, SIPE Form 2-588. However, employees may report hazards by any available method. Oral reports are recorded in writing by supervisors. Reports may be submitted anonymously, at the employee's option. The employer advises all employees that it invites reports of hazards and pledges to take no disciplinary action against any employee as a result of the employee's submission of a hazard report. Employees may submit hazard reports to their supervisor or directly to the safety committee. Supervisors are directed to route all hazard reports to the safety committee. A sample of SIPE Form 2-588 is in Attachment 1.
- 2.3.7 **Accident Investigation:** Every accident is investigated by a supervisor or manager. Accident investigation and analysis including interviews with the injured employee and, as necessary, witnesses to an accident, will be conducted on all accidents using SIPE Form 6-588 to identify the causes and recommend corrective measures. Accident reports should be completed within 48 hours from the time the accident was first reported. Accident investigation reports are forwarded to the safety committee for recommendations as to corrective action. Recommendations for corrective action are entered in the minutes of the safety committee meeting, along with the name of the person assigned to make the corrections. A copy of the minutes is forwarded to the person so assigned. SIPE Form 6-588 can be found in Attachment 2.

- 2.4 Employee and management education will be conducted to instruct and certify workers in safe work practices and use of personal protective equipment; to advise on reporting of unsafe conditions; to inform employees of potential job hazards; and to communicate the enforcement actions which will follow violations of any safety rule or procedure.
- 2.5 Routine inspections will be performed both to assure that existing safety equipment, conditions, housekeeping and work practices are in compliance with applicable laws and to identify additional unsafe conditions and acts. Recommendations on correction of problems will be made by qualified personnel, and a final correction date will be established.
  - 2.5.1 The SIPE Safety officer will perform an annual safety inspection at all school sites.
  - 2.5.2 Safety evaluations performed by SIPE Safety will be submitted to the districts in a draft for review and approval before it is submitted in final. Districts have 30 days to reply with their action on open safety deficiencies.
- 2.6 Recordkeeping will include:
  - 2.6.1 Completion and posting of forms as required by applicable state and federal OSHA regulations.
  - 2.6.2 Completion of forms and records for insurance purposes.
  - 2.6.3 Documentation of all activities relating to the implementation of the Injury & Illness Prevention Program, such as safety meetings, employee training, job safety analyses, safe work procedures, issuance of personal protective equipment and accident investigations. SIPE Form 1-588 will be used to document employee safety training. Online safety training will be recorded using the online data base. Districts may transfer online training on SIPE Form 1-588. A sample of SIPE Form 1-588 can be found in Attachment 3.
  - 2.6.4 Maintenance of statistics on incidence/severity rates of OSHA recordable injuries and illnesses will be provided by Workers' Compensation Administrators or the SIPE Safety Office at least monthly. This report will be briefed to the SIPE Board and filed in the SIPE Safety office.
  - 2.6.5 OSHA Form 300, Log and Summary of Occupational Injuries and Illnesses, must be completed and posted in a conspicuous location from February 1 to March 1. Completed OSHA Form 300's must be kept on file for 5 years.

2.6.6 The supplementary record of Occupational Injuries and Illnesses, OSHA Form 301 is not the only form that can be used to satisfy OSHA requirements. To eliminate duplicate recording, SIPE Form 6-588, Employee's and Supervisors Review of Industrial Injury/Illness Report may be used as the supplementary record.

## 2.7 Correction of Job Hazards

2.7.1 Job hazards discovered in the course of Job Hazard Analyses are referred to the safety officer or appropriate supervisor for consideration. If a hazard can be corrected by a change in practices or procedures, appropriate modifications are instituted at the earliest possible time. If other controls are required, the Job Hazard Analysis is referred to the safety committee for discussion at its next meeting. Interim safety measures are instituted while the matter is pending before the safety committee. The safety committee is required to recommend corrective action to management within a reasonable time, and the management is pledged to report in a timely manner to the safety committee on its progress in making the corrections.

2.7.2 With regard to hazards that are uncovered by periodic inspections, reported by employees, or discovered as a result of an accident, the person receiving initial notice of the hazard, whether an inspector, manager, or safety committee member, is required to record the name of the person assigned responsibility for correction on the form on which the hazard is recorded and to forward copies of any such recommend- dates to all persons so named. All recommendations are followed up within a time limit established by the committee, supervisor or inspector. Any failure of the person assigned the responsibility for correction to take corrective action within the established time limit is reported immediately to the responsible person's supervisor.

2.7.3 Completed inspection checklist, employee hazard reports, and accident investigation report remain open before the safety committee and are not filed away until all corrective measures have been completed and documented.

2.7.4 In the case of imminent hazards that cannot be corrected safely without exposing employees to danger, supervisory personnel are instructed to evacuate all non-essential personnel from the area of the hazard until such corrective measures have been completed as to render the area safe.

## 3.0 RESPONSIBILITIES

3.1 The superintendent of each school district element shall:

- 3.1.1 Designate in writing an individual to be responsible for supervising the Injury & Illness Prevention Program and for notifying the SIPE Safety Officer regarding any state or federal inspection related to occupational health and safety and its outcome, and to notify workers compensation administration and CAL/OSHA of any occupational fatality or serious injury or illness immediately.
- 3.1.2 Designate representatives to serve on a school district safety committee, which shall meet bi-monthly or at least quarterly. This committee is to encourage employee participation in all aspects of safety, monitor the effectiveness of the Injury & Illness Prevention Program, and maintain minutes of its proceedings.
- 3.1.3 As a minimum, participants in the safety committee should be a representative from the following departments; purchasing, personnel, operations/maintenance, transportation, custodial, food service and a representative from each school site.
- 3.1.4 The safety committee functions are:
- Develop safety policies and recommend their adoption by top management.
  - Identify unsafe work practices and conditions and suggest appropriate recommendations.
  - Develop and implement an effective safety training program.
  - Encourage feedback from all levels of employees in all areas of the district with regard to problems, ideas and solutions related to safety.
  - Engage in accident investigations and develop recommendations in light of findings.
  - Develop and recommend adoption of appropriate safety programs to supplement a general program (a specific housekeeping program, fire prevention program, protective clothing program, etc.)
  - Keep everyone in the district informed about new safety policies, training programs, accident causation and other safety related matters.
  - Identify specific safety related problems that seem to be reoccurring and develop appropriate preventative measures.

- 3.1.5 Minutes must be taken, disseminated to all affected employees, and maintained for one year.
- 3.1.6 School districts with 50 employees or less may substitute the safety committee meeting with scheduled safety awareness as an agenda item at their monthly staff meeting.
- 3.2 All levels of management shall be responsible for the success of the Injury & Illness Prevention Program. This includes assuring compliance with all applicable safety practices and procedures by all employees, students and by any non-employee visiting or working in a district facility.
- 3.3 Each employee, as a condition of employment, shall comply with all applicable safety practices and procedures in accordance with instruction and training received.
- 3.4 The school district safety coordinator, under the direction of the school district superintendent, shall provide all district elements with the technical assistance and information required in implementing the Injury & Illness Prevention Program and will audit district elements periodically and report to management on safety deficiencies and accomplishments.

#### 4.0 DISCIPLINARY PROCEDURES

- 4.1 Verbal counseling (will be documented in the employee's personnel file).
- 4.2 Written warning (must outline nature of offense and necessary corrective action).
- 4.3 Suspension without pay (may be used in conjunction with 1 and/or 2 above, or as a separate and distinct disciplinary action resulting from a serious violation).
- 4.4 Termination (may be used in conjunction with 1 and/or 2 above, or as a separate and distinct disciplinary action resulting from a serious violation).

#### 5.0 OSHA INSPECTORS PROTOCOL

- 5.1 When an OSHA inspector arrives on site, school districts will:
  - 5.1.1 Greet the inspector with courtesy.
  - 5.1.2 Determine the purpose of his visit.
  - 5.1.3 Contact the responsible supervisor, safety coordinator and district superintendent.

- 5.1.4 Provide the documentation requested and accompany the inspector on his walk through.
- 5.1.5 Request the inspector to conduct a post conference with appropriate site staff.
- 5.2 Districts can contact the SIPE safety office for direction or questions at 922-8003.