

Chapter 1 - Injury and Illness Prevention Program

Table of Contents

- 1.1 Purpose**
- 1.2 Applicability**
- 1.3 Authorities Incorporated by Reference**
- 1.4 Revision**
- 1.5 Components of the Injury and Illness Prevention Program**
 - 1.5.1 Authority and Responsibility
 - 1.5.2 Ensuring Compliance
 - 1.5.3 Safety Communications
 - 1.5.4 For a Copy of the Injury and Illness Prevention Program
 - 1.5.5 Hazard Identification and Assessment
 - 1.5.6 Accident Investigations
 - 1.5.7 Hazard Correction Procedures and Programs
 - 1.5.8 Safety Training
 - 1.5.9 Recordkeeping
- 1.6 Applicable Regulations**
- 1.7 Appendix**
 - 1.7.1 §3203 Injury and Illness Prevention Program

1.1 Purpose

This manual sets forth policy, procedures and instructions for the County of Santa Clara's Injury & Illness Prevention Program (IIPP) and assigns authority, responsibility and requirements relative to these programs.

1.2 Applicability

This manual is applicable to all County of Santa Clara employees, to all work conducted under the authority of the County, and to all equipment and property managed by the County. County contractors and other non-contractor personnel will follow the provisions of this Program while at County facilities.

1.3 Authorities Incorporated by Reference

1. Title 8 Code of California Regulations (CCR), Subchapter 7, Groups 1-27, Sections 3200-6200 (State Occupational Safety and Health Standards)
2. Title 29 Code of Federal Regulations (CFR) Parts 1900 through 1999 (Federal Occupational Safety and Health Standards)

1.4 Revision

This manual is updated periodically because of frequent changes in health and safety information and regulations promulgated by both Occupational Safety and Health Administration (OSHA) and State of California. It is intended to be used as a practical resource guide for all employees of the County of Santa Clara. For the most current safety and health information, please visit the Occupational Safety and Environmental Compliance (OSEC) intranet web site at <https://www.sccgov.org/sites/osec/SafetyResources/Pages/InjuryIllnessPreventionPlan.aspx> or contact OSEC at:

County of Santa Clara
Office of the County Executive
Occupational Safety and Environmental Compliance
2310 N First Street, Suite 204
San Jose, CA 95131
Tel (408) 441-4280
Email: OSEC@ceo.sccgov.org

1.5 Components of the Injury and Illness Prevention Program

1.5.1 Authority and Responsibility

The OSEC Manager or his designee is responsible for implementing the IIPP for the County of Santa Clara.

Specific responsibilities for Departments and Agencies are described in Chapter 2.

1.5.2 Ensuring Compliance

- Employees injured on the job shall be afforded medical treatment
- Initial training is provided to employees.
- An Employee Safety Recognition program is established for employees who make outstanding contributions to workplace safety. It is administered and sponsored by the Countywide Labor/ Management Safety Committee.
- First-line supervisors and managers provide additional training for employees who do not follow safe work practices.
- Unsafe work practices are remedied through progressive counseling.

1.5.3 Safety Communication

Santa Clara County encourages open, two-way communication between management and employees, especially with respect to environmental, health and safety (EHS) issues. No procedures or work practices should be implemented that impede this communication process.

1.5.3.1 General

The IIPP is designed to allow and encourage employees to communicate with management on EHS issues. The IIPP also provides a mechanism for management to keep employees informed of important EHS matters. Employees have been advised that there will be no reprimand, reprisals or other job discrimination for expressing any concern, comment, suggestion, or complaint about a safety-related matters. Furthermore, employees are informed of their other rights and protection under the law, including:

- Access to medical records
- Access to Safety Data Sheets for chemical use
- Right to refuse unsafe or hazardous work

1.5.3.2 Communication and Safety Rules

To communicate general policies and rules, all employees shall receive their initial New Hire Orientation training during their first week of employment. Supervisors should review specific safety policies and job safety procedures with new employees. Supervisors shall also maintain ongoing communication with employees regarding safe work practices.

Santa Clara County provides multiple methods of safety communication County-wide and at the Department level to inform employees of EHS issues, safety policies, and procedures. Additional safety communication efforts include the following:

- Newsletters
- Bulletin boards
- Printed safety instructions and pamphlets
- Memos, emails, and websites
- Hazard reporting system
- Safety coordinator program
- Countywide and department safety committees are organized to encourage active safety communication between management and employees. Labor/management safety committees may assist with the following safety responsibilities:
 - Meet regularly, but not less than quarterly.
 - Prepare and distribute Safety Committee meeting minutes to employees.
 - Review investigations of hazardous conditions/practices identified on Hazard Reports.
 - Assist Supervisors with workplace safety inspections, and follow up on results and recommendations.
 - Assist in evaluating employee safety suggestions.
 - Provide recommendations for safety changes, and
 - Provide additional safety support functions as needed.

1.5.3.3 Compliance and Reporting Safety Concerns

Santa Clara County encourages all employees to communicate and report any safety suggestions, concerns, and comments to their Supervisor.

Violation of EHS policies may result in the following severe circumstances:

- Personal injury or illness
- Injury or illness inflicted upon co-workers
- Environmental impact
- Equipment, property, or facility damage

- Business interruption and financial loss

1.5.4 For a copy of the Injury and Illness Prevention Program

To obtain a copy of the County of Santa Clara Injury and Illness Prevention Program:

- Go to OSEC website:
<https://www.sccgov.org/sites/osec/SafetyResources/Pages/InjuryIllnessPreventionPlan.aspx>
- Email OSEC at OSEC@ceo.sccgov.org
- Call OSEC at (408)441-4280

1.5.5 Hazard Identification and Assessment

1.5.5.1 Identification of Workplace Hazards

Santa Clara County periodically inspects job sites to evaluate workplace safety conditions and safe work practices.

Supervisors, or their designees, will be responsible for scheduling regular inspections. When appropriate, members of the Departmental Safety Committee, may assist.

Supervisors may also conduct inspections whenever new substances, processes, procedures or equipment are introduced and represent a new hazard, or when supervisors are notified of a new or a previously unrecognized hazard.

Departmental Environmental Health and Safety (EHS) Professionals, Safety Coordinators, OSEC, outside consultants, or third party agencies may conduct unscheduled inspections or industrial hygiene monitoring to evaluate workplace safety. Identified safety exposures will be addressed, corrected or mitigated within a reasonable timeframe.

1.5.5.2 Hazard Reporting

Employees can directly report hazards through the County Hazard Report form, and submit it to their supervisor for follow-up. This report can be anonymous. All reports will remain confidential.

1.5.5.3 Job Hazard Assessments

1.5.5.4 Additional Safety Programs

Contact OSEC for guidance on implementing additional Department or Agency specific safety programs.

1.5.6 Accident Investigations

Accident investigations identify causative or contributing factors or occupational injuries and illnesses, and help determine if any action is necessary in preventing recurrence. They are not intended to fix blame upon an individual or group of individuals. An accident is defined as an unexpected and undesirable event that results in injury or property damage. Accidents that do not result in injury or property damage are often referred to as “incidents” or “near misses.” All accidents involving injury or property damage are to be investigated. Furthermore, “near misses” that could have produced significant injury or damage should also be investigated.

The safety hazard reporting / accident investigation reporting process can involve the assistance of multiple individuals and levels of management. This process requires the investigation and elimination of the problem at the lowest possible level. The Hazard Report is used to document any follow-up action taken. Additional instructions regarding the accident investigations process are provided below:

- The injured employee’s Supervisor shall investigate all injuries/illnesses. The Supervisor’s First Report of Industrial Injury/Illness form has an investigative section for Supervisors to complete.

The First Report of Industrial Injury/Illness form is distributed to the Departmental Safety Coordinator for review and follow-up.

The Departmental Safety Coordinator shall be notified immediately when serious or multiple injuries/illnesses occur. In the event of a serious injury, fatality, or catastrophe, OSEC shall be contacted as soon as possible to assist with Cal/OSHA reporting within 8 hours of the incident.

1.5.7 Hazard Correction Procedures and Programs

Unsafe or unhealthy conditions within County facilities are identified through inspections, hazard reports, and/or accident investigations. Safety deficiencies shall be prioritized and corrected. Supervisors shall use the fundamental three E’s of safety to ensure safe work practices are followed: Engineering, Education, and Enforcement. Correcting the hazards through sound engineering principles is the first and foremost method of hazard correction. Education and retraining may be necessary to promote safe work practices.

Unsafe or unhealthy conditions, work practices, or procedures will be corrected in a timely manner based on the severity of the hazard:

- When observed or discovered, or
- When an imminent hazard exists which cannot be immediately abated without endangering employee(s) and/or property, all exposed personnel will be removed from the area except those necessary to correct the existing condition. Employees necessary to correct the hazardous condition shall be provided the necessary safeguards.

1.5.8 Safety Training

The County safety policy, safety goals, and safety guidebook are provided to new employees at New Employee Orientation training. Employee training and instruction will be provided by Department Safety Coordinators and Supervisors, and will include:

- Necessary means of minimizing potential hazards, including safe work practices
- Instruction on personal protective equipment or procedures which should be used
- The specific elements of this IIPP
- Review of the IIPP and safety and health policies for employees
 - Reporting of Workplace Hazards and Accidents, Injuries and Incidents
 - Hazard Identification
 - Hazard Correction
 - Employee Communication
- When assigned, Safety Coordinators are provided with their Department safety training responsibilities and the EHS safety training matrix. Safety Coordinators receive training through regular Safety Coordinator Forums on Cal/OSHA refreshers, train-the-trainer subjects, and other pertinent safety topics.

The Annual Safety Seminar provides an opportunity for more safety training, and is open to all County employees (contingent upon supervisor approval).

As job duties or work assignments change, or as new processes, machinery, chemicals, etc. or previously unrecognized hazards are observed, additional training may be required and will be conducted as needed. Because job duties or work assignments change, and new processes, machinery, chemicals, or previously unrecognized hazards are routinely identified, the training program will be reviewed at least annually and revised, as necessary, by the Department Safety Coordinator and/or Supervisor.

1.5.9 Recordkeeping

1.5.9.1 Inspection Records

Ongoing work area inspection records and corrective action documentation are kept for a period of at least three years by the Department/Division Safety Coordinator.

1.5.9.2 Training Records

Copies of training records are kept by the Department/Division Safety Coordinator for not less than three years following successful completion of the class.

1.5.9.3 Medical Records

Medical surveillance records are maintained by the Department for the duration of employment plus thirty years. Additionally, the following guidelines in the handling of employee medical records will be utilized:

- Separate confidential and non-confidential information records on employee health records will be kept
- Access to confidential health information will be controlled
- Employee health records will be retained for the duration of employment plus 30 years
- Subpoenas will be complied with while protecting privileged information on litigated files

1.5.9.4 Accident Investigation & Employee Complaints

Accident investigation and employee complaint records will be kept on file by the Department/Division Safety Coordinator for at least three years.

1.5.9.5 Industrial Hygiene Records

Industrial hygiene records will be kept on file by the Department/Division Safety Coordinator for at least 30 years.

1.6 Applicable Regulations

This document complies with regulations under Title 8, California Code of Regulations (CCR), Section 3203 which can be found at the following link:
<https://www.dir.ca.gov/title8/3203.html>