

Injury and Illness Prevention Program

Behavior Health Services Department

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Prepared for:

County of Santa Clara Behavioral Health Services Department 828 South Bascom Avenue

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1 Policy

This directive establishes the written Injury and Illness Prevention Program (IIPP) for the County of Santa Clara (County) Behavioral Health Services Department (BHSD) as required by California Code regulations, Title 8, Chapter 4, Section 3203 of the General Industry Safety Orders. A copy of the Injury and Illness Prevention Program is available in on the Shared Drive in the Safety Folder for review by employees and/or employee representatives.

BHSD's policy is to provide a safe and healthful workplace and the personal safety and health of each employee is of primary importance. The overall goal of this IIPP is to reduce actual or potential personal injury accidents of all types, and ensure the safety and wellbeing of all employees in the work environment. BHSD employs many people doing many, diverse jobs both inside and outside of BHSD and County of Santa Clara facilities. This requires that our IIPP involve all BHSD Divisions and their staff to identify and manage risk exposures related to each individual's job requirements.

1.1 General Workplace Safety and Health Practices

- Implementation and maintenance of the IIPP
- Emergency procedures and evacuation plan
- Provisions for medical services and first aid
- Prevention of musculoskeletal disorders, including proper lifting techniques
- Prevention of violence in the workplace
- Proper housekeeping, such as keeping stairways and aisles clear, work areas neat and orderly, and promptly cleaning up spills
- Proper storage to prevent stacking items in an unstable manner and storing goods against doors, exits, fire extinguishing equipment and electrical panels
- Proper reporting of hazards and accidents to supervisors
- Hazard communication, including worker awareness of potential chemical hazards, and proper labeling of containers
- Proper storage and handling of hazardous substances including prohibiting eating or storing food and beverages in areas where they can become contaminated

2 Scope and Applicability

This Injury Illness Protection Program applies to all facilities and operations under the direct control and authority of BHSD. The program extends to all workforce members including employees, interns, and temporary employees providing services at the facilities, workplaces, and events under the direction of BHSD. It is recognized that the safety management program also extends to controlling exposures or hazards that may affect contractors, visitors, and the public conducting business at facilities or events at BHSD facilities.

This IIPP includes all of the following elements consistent with 8 CCR §3203 and other applicable Cal/OSHA standards:

- A system to identify, prevent and correct safety and health hazards
- Periodic scheduled inspections
- Investigation of injuries, illnesses, and accidents
- Employee safety training
- Communication with employees regarding safety and enforcement of safety rules
- Record keeping consistent with applicable requirements

3 Responsibilities

Safety is partnership effort, involving all employees sharing in the implementation of BHSD's IIPP. In order to deliver a safe and healthy work environment, the following roles and responsibilities are assigned under this program:

3.1 Department Director

The Director of the Behavioral Health Services Department, or their designee has the authority and responsibility of the IIPP for BHSD.

3.2 Occupational Safety and Environmental Compliance Department (OSEC)

- Provides appropriate and effective response to all environmental and occupational safety issues.
- Supports a safety-conscious and environment-friendly workforce.
- Develops occupational safety programs and training that result in a safer workplace.
- Provides County departments with guidance in the areas of environmental, health and safety policies and procedures.

- Helps County agencies/ departments maintain compliance with applicable regulations Maintains and makes available current information including technical information, applicable environmental and occupational safety policies and regulations and their interpretations.
- Continually improves environmental compliance and occupational safety programs.

3.3 Safety Coordinators

Safety Coordinators serve as coordinators responsible for the implementation of departmental workplace safety programs. They also make sure the department complies with safety laws and regulations, and work with employees, first-line supervisors and managers to resolve safety problems.

3.4 First Line Supervisors

First-line supervisors have a major responsibility for ensuring a safe workplace since they must provide the guidance; information and support employees need to do their work safely. Supervisor's you by example through reinforcing and modeling safe work practices and responding to safety concerns proactively.

3.5 All Employees

Employees are responsible for their own safety, the safety of their co-workers, and clients in the workplace. Although the BHSD will provide a safe and healthy work environment, it is up to individuals to use safe work practices and to be alert for safety hazards.

4 Compliance

BHSD encourages all employees to communicate and report any safety suggestions, concerns, and comments to their Supervisor, Safety Coordinator, or through the County Hazard Reporting Process. The following procedures are in place to ensure compliance with the IIPP:

- 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.

5 Communication

5.1 Employee Communication

BHSD has various ways of communicating with the employees. They include the use of a Safety Committee, all staff meetings, division and location meetings, postings and employee training.

Supervisors will communicate with their employees/staff about health and safety topics as well as safe work practices. Communication is implemented through various methods including:

- New-employee orientations including a discussion of safety and health policies and procedures
- Review of the IIPP
- Newsletters
- Bulletin boards
- Printed safety instructions and pamphlets
- Memos, emails, and websites
- Hazard reporting system
- Training programs
- Regularly scheduled safety meetings
- Posted or distributed safety information including the minutes of the Safety Committee meetings
- A system for employees to anonymously inform management about workplace hazards by completion and submission of the County Hazard Report Form available for download on from the County OSEC Department Website at <u>https://www.sccgov.org/sites/osec/Pages/Home.aspx</u>.

Documentation is an important part of communication and should be completed as follows:

- Safety meetings are documented by a signed list with attendees' names, the date and the topics covered.
- Actions taken to enforce compliance with safe work practices in cases that exceed verbal counseling will be documented in the employee's personnel records

5.2 Safety Committee

The BHSD Safety Committee is organized to encourage active safety communication between management and employees. The safety committees assist with the following safety responsibilities:

- Meet quarterly, at a minimum.
- Prepare and make Safety Committee meeting minutes available 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.
- Provide additional safety support functions as needed

The BHSD Safety Committee is made of the BHSD Safety Coordinators who represent the following facilities and/or Divisions:

Safety Coordinator	Location/Division	Address
Coordinator 1(Serves as Chair	BHSD Admin	828 S Bascom Ave
of Safety Committee)		San Jose, CA 95128
Coordinator 2	24 Hour Care	2221 Enborg Lane
		San Jose, CA 95128
	Call Center	871 Enborg Court
	Urgent Care BHS	San Jose, CA 95128
	Whole Person Care	
Coordinator 3	Central Wellness & Benefit	2221 Enborg Lane
	Center	San Jose, CA 95128
Coordinator 4	Downtown	1075 East Santa Clara St.
	Zephyr Self Help	San Jose, CA 95166
	Learning Partnership	
	Decision Support	
Coordinator 5	Evans Lan	2090 Evans Lan
		San Jose, CA 95125
Coordinator 6	JPD	840 Guadalupe Parkway, #238
		San Jose, Ca 95118
Coordinator 7	Kidscope	828 S Bascom #100
		San Jose, CA 95128
Coordinator 8	Las Plumas	1650 – K Las Palmas Ave
		San Jose, CA 95133
Coordinator 9	Mobile Crisis San Jose/Gilroy	871 Enborg Court
		San Jose, CA 95128
		1235 1 st Street
		Gilroy, CA 95020
Coordinator 10	Narvaez BHS	614 Tully Road
		San Jose, CA 95111
Coordinator 11	Medi-Plex	725 East Santa Clara Street,
		3 rd Floor
		San Jose, CA 96116
Coordinator 12	Drug Treatment	201 N 1 st Street 2 nd Floor
		San Jose, CA 95110
Coordinator 13	East Valley PCBH	1993-C McKee Road
		San Jose, CA 95113
Coordinator 14	Sunnyvale PCBH	660 S. Fair Oaks Ave 3 rd Floor
		Sunnyvale, CA 94086

The Safety Committee Chair maintains a list of current Safety Coordinators. Alternates may attend Committee meetings when a member is unable to attend, or at the request of the Committee. It is intended that voting members, or alternates if necessary, attend every scheduled meeting. Safety Committee Meetings are held at least quarterly on a schedule to be determined by the membership and Program Administrator or their designee.

The Safety Committee meetings will be held in a location decided by the membership and Program Administrator or their designee. The sample agenda for each of these Safety Committees may include the following:

- Discuss/Accept previous minutes
- Review Issues and discuss Action Log
- Review Open Inspection Findings
- Work Related Incidents/Accidents
- Report of Unsafe Conditions
- New Business Open Forum
- Schedule next meeting

6 Hazard Assessment

The system used to identify safety and health hazards in the work environment includes:

- Using information from Cal/OSHA standards
- Reviewing information found on the OSHA 300 Log and Workers' Compensation Employer's Report of Occupational Injury or Illness, also known as the "Employer's First Report,"
- Periodic inspections
- Investigating injuries, illnesses and accidents
- Information provided by employees

6.1 Reporting Unsafe Conditions or Workplace Hazard

Any BHSD employee can report potential hazards or unsafe condition in the work area to his/her Supervisor or a Safety Coordinator. This reporting will be done without fear of reprisal.

- Upon receiving such notification, the Supervisor and/or Safety Committee representative will take whatever action(s) necessary to eliminate the identified hazard/condition and shall notify the employee of corrective action(s) taken or to be taken.
- If the hazard/condition discovered may cause a serious injury or illness, it shall be corrected immediately; or employees shall be removed immediately from the area or the source of the hazard

- If the hazard is one that is easily abated, it shall be corrected immediately
- Other hazards shall be corrected in a timely manner

If the alleged hazard is not addressed in a timely manner, or if the employee prefers the condition be documented in writing the following procedures are to be followed:

• 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. The Hazard Report Form and instructions are available for download from the OSEC Website at https://www.sccgov.org/sites/osec/Pages/Home.aspx.

6.2 Workplace Inspections

Supervisor or Safety Coordinators will conduct periodic workplace safety inspections. An optional checklist to facilitate these inspections is include in Attachment C. These items will be brought to the Safety Committee Meeting for addressing and discussing. Follow-up actions to all findings will be addressed following each inspection.

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. Supervisors may also conduct inspections on an as-needed basis and are encouraged to conduct inspections upon receiving an incident report.

Departmental 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, agreed upon, timeframe.

6.3 Job Hazard Analysis (JHA)

In order to understand the risks and hazards of a specific job or task, an evaluation of that job/task should be completed through a Job Hazard Analysis (JHA). The results of these reviews/evaluations are used to determine how to protect employees while they work. Job Hazard Analysis evaluations should be completed for different job classifications by the group to be performing the task. A hazard can be any factor that causes damage to personnel, property or the environment with a history of, or potential for, injury, harm or damage. Attachment B includes a templated JHA that can be used to facilitate this purpose.

7 Accident/Exposure Investigations and Corrective Actions

Accident investigations identify causative or contributing factors of 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.

7.1 Accident Response

When an accident occurs, the employee or co-worker notifies his/her Supervisor as soon as possible about the event. Conditions that may require use of outside emergency assistance include fire or medical emergencies.

When an employee is injured on the job, to following immediate responses are to occur:

- For Serious Work Injuries, dial 911 for an ambulance or take the employee to the nearest Emergency Room.
- Employees are instructed to inform their Supervisor immediately.
- For non-serious work related injuries, employees are to work with their supervisor to obtain appropriate medical care.
- Employees are instructed to follow the doctor's instructions and keep their Supervisor informed.
- Supervisors are responsible for ensuring that employees receive appropriate medical care
- Supervisors are to complete an Accident Investigation form as soon as possible following the accident/incident.
- Report all serious Injuries within 8 hours to Cal/OSHA's 24-hour serious injury/death reporting line at 510-794-2521. A serious injury is defined by a specific or cumulative, occurring in the place of employment or in connection with any employment, that results in any of the following:
 - Inpatient hospitalization for purposes other than medical observation
 - The loss of any member of the body
 - Any serious degree of permanent disfigurement
 - Impairment sufficient to cause a part of the body or the function of an organ to become permanently and significantly reduced in efficiency on or off the job, including, but not limited to, depending on the severity, second-degree or worse burns, crushing injuries

including internal injuries even though skin surface may be intact, respiratory illnesses, or broken bones

 Serious physical harm may be caused by a single, repetitive practice, means, method, operation, or process

7.2 Investigation Procedures

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. 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 BHSD Safety Coordinator(s) for review and follow-up.

Supervisors are to notify the BHSD Safety Coordinator when a serious accident occurs or more than two injuries/illnesses occur by the same or similar mechanism. In the event of a serious injury, OSEC shall be contacted as soon as possible to assist with the California Division of Occupational Safety and Health (Cal/OSHA) reporting within eight hours of the incident.

7.3 Corrective Action Process

Corrective Actions will be implemented when a hazard is identified or following an accident or incident to prevent recurrences. Corrective actions will be determined by supervisors and/or the Safety Committee with the assistance of OSEC if needed. Corrective actions should address all aspects of each identified problem. This may entail one or several corrective actions to resolve the finding. The corrective actions may include remedial actions (to remedy the finding) and preventive actions (to prevent the same and similar findings from recurring). The following should be considered when implementing corrective actions:

- The hazardous situation or accident must be clearly defined and the corrective action should be implemented as soon as feasible
- The Safety Committee will review the corrective action to follow up and ensure that all necessary components or processes have been implemented

Types of corrective actions include:

- Training
- Changes in current procedures or practices
- Additional equipment or change in equipment
- Modification to existing equipment
- Improvements to maintenance schedules
- Disciplinary actions

• If a temporary correction is the only possible action, ensure that follow up is completed and a more permanent solution is implemented as soon as feasible

8 Training and Instruction

All safety training shall be documented by BHSD, listing date of training, topic of training, and employees receiving training. Documentation is to be retained by BHSD for a period of at least three years from the date of training. Copies of the documentation shall also be submitted to the Safety Coordinator applicable to the area.

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 BHSD 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 the BHSD 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, or previously unrecognized hazards are observed, additional training may be required and will be conducted asneeded. 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 periodically and revised, as necessary, by the BHSD Safety Committee.

9 Recordkeeping

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 BHSD Safety Coordinator that conducted the inspection.

9.2 Training Records

Copies of training records are kept for a period of at least three years by the Program Administrator or their designee following successful completion of the class.

9.3 Medical Records

Medical surveillance records are kept for a period of thirty years following termination of employment for any means by the Department in which the employee worked. Additionally, the following guidelines for handling employee medical records will be utilized:

- Separate confidential and non-confidential information records on employee health will be maintained.
- Access to confidential health information will be controlled.
- Subpoenas will be complied with while protecting privileged information on litigated files.
- All applicable rules, laws, and regulations, including HIPPA, will be followed at all times, even after employee separation from the county.

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.

9.5 Industrial Hygiene Records

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

Attachment A: Safety Orientation Checklist



Safety Orientation Checklist

As required under the California Injury and Illness Prevention Program Regulation and County Policy, every supervisor must instruct each new employee in the safety requirements of the job. The following checklist is provided for that purpose. Instruction should be completed within one (1) week after the employee is hired. Check each of the items on this form at the time instruction is given. When completed, sign, obtain employee's signature and give original to the employee. Place a copy in the employee's health and safety records file.

Employee	Name: Date Hired:		
Job Class T	itle:		
Agency:	Department:		
	Topic Completed		
	Emergency Procedures/Alarm Sound/Evacuation Routes		
□ Fire Protection/Location of Fire Extinguishers			
	First Aid Kit and ERT Personnel		
	Report Safety/Health Hazards		
	Reporting Injuries		
	Explanation of Job Hazards and Safe Work Practices		
	Location and Review of Hazard Communication Program and Safety Data Sheets		
	Ergonomics		
	Proper Lifting Techniques		
	Location and Review of Injury and Illness Prevention Program (IIPP)		
	Housekeeping		
	County Driver Orientation		
	Interested in becoming ERT certified/member		

I instructed the above new employee in the subjects checked and believe he/she can reasonably be expected to perform his/her duties with an adequate degree of safety.

Safety Coordinator for 828 S. Bascom Ave, Suite 190, 200, 280:

	Date:
Supervisor:	Date:
Employee:	Date:

Safety Goals

- The County of Santa Clara values its employees and clients and will provide healthy, safe and secure County facilities for them.
- Safety is everyone's responsibility, and the County supports and encourages employees to identify and resolve safety problems.
- Response to safety concerns will be given the highest priority at every level of County government.

Attachment B: JHA Template

Job Hazard Analysis

Project Name:

Project Start Date:

Work Location:

Description of work to be completed, including identification of equipment to be worked on and any activity limitations, as applicable:

Step No.	Job Step	Potential Hazard or Risk	Actions to Eliminate Hazards or Reduce Risks
1			
2			
3			
4			

Attachment C: Safety Inspection Form

Safety Inspection Form Common Areas & Offices

Date:	//			
Name of De	partment:			
Location:				
Inspected b	y:			
A. Floors:		Yes	No	N/A
1. 2. 3. 4. 5.	Floors are free of liquids or other slip hazards. No tripping hazards on the floor. Electrical cords are taped down or a sill is over them. No slippery areas on the floor like highly waxed areas. No loose carpeting. No loose seams or tears in walkways.			
B. Furnitu 1. 2. 3. 4. 5. 6. 7. 8. 9.	File cabinet drawers closed.	Yes		N/A
C. Restroo 1. 2. 3. 4.	Floors not slippery even when wet. No obstructions or trip hazards on the floor. All areas free of sharp edges.	Yes	No 	N/A
1. 2. 3. 4. 5. 5. 6. 7. 8. 9. 10. 11. 12. 13.	Self-closing fire not doors propped open. Stairwell doors closed. No storage under stairwells.	Yes		

- 15. No portable heaters.
- 16. Outlets free of multiple adapters.
- 17. Cords are not frayed or damaged.

E. First Aid:

- 1. First-aid kits maintained and inspected monthly.
- 2. First aid log available and current.
- 3. Personnel trained in first aid are available.

Remarks And Recommendations:

