

**CITY AND COUNTY OF SAN FRANCISCO
OFFICE OF THE CITY ADMINISTRATOR**

Injury and Illness Prevention Program (IIPP)

SUMMARY:

This Injury & Illness Prevention Program (IIPP) includes guidelines, practices, and procedures to reduce the potential for occupational injuries and illnesses of Office of the City Administrator employees. This is accomplished through a comprehensive program including compliance, hazard communication, hazard identification, incident reporting and investigation, hazard control, and training.

AUTHORITY:

California Code of Regulations (CCR), Title 8, General Industry Safety Order, Section 3203 and Construction Safety Order, Section 1509.


SCOPE:

This program applies to Office of the City Administrator managers, supervisors, and employees. This program is posted on the Office of the City Administrator SharePoint site:
<https://sfgov1.sharepoint.com/sites/ADM-CityAdminHR-HeathandSafety>

IMPLEMENTATION:

Office of the City Administrator shall fully implement this program. The target date for implementation of this revised program is December 1, 2022.

Approved By: _____


Carmen Chu
City Administrator
City and County of San Francisco

Date Issued: July 1, 2009
Date Revised: June 21, 2013
Date Revised: December 1, 2017
Date Revised: February 27, 2020
Date Revised: December 1, 2022

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OFFICE OF THE CITY ADMINISTRATOR**

INJURY AND ILLNESS PREVENTION PROGRAM

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INJURY AND ILLNESS PREVENTION PROGRAM (IIPP)

1.0 POLICY

The operations conducted by the City and County of San Francisco, Office of the City Administrator encompass a variety of activities, departments and programs, which present potential hazards to the health and safety of employees. It is our goal to minimize that potential risk, and to the greatest possible extent, eliminate it. The IIPP is based on the premise that occupational safety and health are responsibilities of line management who must translate this concern into action, which involves every employee.

Each department and program in Office of the City Administrator will conduct its operations and maintain its facilities and equipment in compliance with Cal/OSHA and other applicable safety and health regulations. Employees are required to follow rules and procedures and to observe applicable local, state and federal safety regulations in the performance of their assigned duties. Safety and health are important measures of performance and will be considered in evaluating the effectiveness of management and non-management employees.

1.1 Background

In October 1989, the California State Legislature enacted, as an emergency statute, Chapter 1369 (Senate Bill 198) California Code of Regulations (CCR), Title 8, General Industry Safety Order, Section 3203 and Construction Safety Order, Section 1509. This statute requires each employer to establish, implement, and maintain a written, effective IIPP. Further, the law requires Cal/OSHA to promulgate specific regulations and to evaluate IIPPs as part of their routine inspection procedures. The major requirements of the legislation are:

- **Management Commitment/Program Responsibility:** Employers must demonstrate commitment to safety and health in the workplace. Employers must have a written IIPP that designates the person(s) responsible for program implementation.
- **Employee Compliance:** Employers must establish a system for ensuring that employees comply with safe and healthy work practices, and such a system should include disciplinary action and incentives.
- **Communication:** Employers must establish a system for communicating health and safety information to employees and encouraging employees to inform the employer of perceived hazards without fear of reprisal.
- **Hazard Assessment:** Employers must establish a system for identifying and evaluating workplace hazards including periodic inspections of work conditions and practices.
- **Injury or Illness Investigation:** Employers must establish a procedure for investigating occupational injuries and illnesses.
- **Hazard Correction:** Employers must adopt methods and procedures for correcting unsafe or unhealthy work conditions and practices, and must ensure that such work conditions and practices are corrected in a timely manner, based on the severity of the hazard.

- Health and Safety Training: Employers must institute an occupational health and safety training program for employees and supervisors.
- Recordkeeping and Access: Records of scheduled and periodic inspections to identify unsafe conditions and work practices and documentation of employee safety and health training. Employees and their authorized representatives have a right to access this program.

1.2 Procedures

This document serves as the Office of the City Administrator written IIPP. This program was established Office of the City Administrator -wide in July 1, 2009. Previously, the separate departments and programs had developed their own written IIPPs. A copy of this IIPP is available on the Office of the City Administrator SharePoint site <https://sfgov1.sharepoint.com/sites/ADM-CityAdminHR-HeathandSafety>. The Supervisor Safety Handbook will serve as the procedural manual for the IIPP. The Handbook provides supervisors with guidance on how to perform specific procedures. For more implementation information on issues and forms mentioned in this policy, refer to the Supervisor Safety Handbook.

1.3 Assignment of Responsibility

The IIPP administrator for the Office of the City Administrator is Mark Hennig, Manager of Health and Safety. The following are the IIPP responsibilities:

Department/Program Directors

The Directors shall establish the goals, policies, and expectations for health and safety pursuant to the authority of their position(s) as set forth in the Charter of the City and County of San Francisco. Responsibilities include the following:

- Adopt and enforce the IIPP. Review, approve and support major program modifications and policies.
- Support budget for safety.

Environmental Health and Safety (EHS)

Environmental Health and Safety is responsible for providing guidance and technical assistance to the Office of the City Administrator departments and programs to enable them to implement a comprehensive health and safety program. Responsibilities include the following:

- Audit compliance with the IIPP.
- Develop Office of the City Administrator-wide policies, standards, and procedures to ensure compliance with new Federal and Cal/OSHA safety regulations.
- Report to management and employees on occupational injuries and illnesses, and identify trends and problem areas.
- Provide technical assistance on compliance with environmental, hazardous materials, and health and safety regulations.
- Provide Office of the City Administrator-wide health and safety training programs, and assist in developing Department/Program-specific and job-specific health and safety training and code of safe practices.
- Conduct health and safety inspections and make recommendation for corrective actions.
- Assist Departments/Programs with investigations of serious injuries and illnesses.

- Act as a liaison between the Office of the City Administrator and regulatory agencies.

Managers

Primary responsibility for implementing and maintaining safety is assigned to Office of the City Administrator Department/Program Managers. Responsibilities include the following:

- Conduct a regular review of incident trends. Support programs to reduce incidents.
- Review incident investigation reports and initiate corrective action where needed.
- Review and act on safety inspection recommendations made by outside inspectors representing City, State, or Federal Agencies.
- Evaluate supervisors on the effectiveness of their safety efforts.
- Make safety a regular agenda item at staff meetings.
- Appoint and support the Safety Recordkeeper.
- Budget for expenditures for health and safety.

Safety Recordkeepers

Safety Recordkeepers act as a liaison between Environmental Health and Safety and the Department/Program. Responsibilities include the following:

- Maintain injury and illness records according to Cal/OSHA regulations for the organization.
- Coordinate health and safety training for organization.
- Coordinate medical monitoring for organization.
- Maintain training log and training records for organization.
- Maintain hazard log and inspection records for organization.

Supervisors

Supervisors are responsible for implementing and maintaining the IIPP in their work areas and answering questions about the IIPP. Responsibilities include the following:

- Provide job instruction and a review of safety rules and procedures for new employees and for employees transferring to new job assignments.
- Provide employees with job specific safety training and tailgates.
- Develop job specific code of safe practices and review them with employees.
- Inspect assigned operations to verify that they can be and are performed safely.
- Investigate and determine the possible cause(s) of incidents.
- Provide employees with appropriate personal protective equipment; require its use and proper maintenance.
- Obtain medical care for injured employees and report injuries promptly.
- Enforce safety rules that apply to assigned operations.

Employees

Employees are required to comply with Cal/OSHA regulations, to observe safety rules and procedures, and to help identify safety problems. Responsibilities include the following:

- Know and obey safety rules and procedures that apply to assignment.
- Do not undertake any task, use any tool, or operate equipment unless authorized to do so.
- Report and when possible, mitigate unsafe conditions and practices.
- Use proper safeguards.
- Report injuries and near-miss incidents, no matter how minor.
- Ask for assistance when you do not fully understand the safe way to do a job.
- Encourage other employees to work safely.

2.0 COMPLIANCE

Management is responsible for ensuring that safety and health policies and procedures are clearly communicated and understood by employees. Directors, managers and supervisors are expected to enforce the rules fairly and uniformly. Employees are responsible for using safe work practices, for following directives, policies and procedures, and for assisting in maintaining a safe work environment. Our system of ensuring that workers comply with the rules and maintain a safe work environment include:

- Informing workers of the provisions of our IIPP;
- Evaluating the safety performance of workers;
- Recognizing employees who perform safe and healthful work practices;
- Providing training to workers whose safety performance is deficient;
- Disciplining workers for failure to comply with safe and healthful work practices.

Full compliance is achieved by three methods: (1) training to ensure employees have the necessary knowledge to do a job safely; (2) positive motivation to encourage and reinforce appropriate action; and finally, (3) progressive discipline for failure to follow procedures.

2.1 Training

Training will provide to employees to carry out job responsibilities in a knowledgeable and safe manner. This training is mandatory for employees, with the specific training requirements determined by Department/Program, job classification, and job assignments.

2.2 Positive Reinforcement

Methods may include the following manager and supervisor actions:

- Modeling safe work behavior, including wearing personal protective equipment.
- Giving regular verbal reinforcement for following desired behavior.
- Telling employees what is expected of them and what potential injury or illness can occur from not following safe procedures.
- Making safety a regular agenda item at staff meetings.
- Recognizing employees who perform safe and healthful work practices.

2.3 Discipline

Employees have a right to a safe and healthy workplace provided by the employer. Similarly, employees must know that failure to comply with health and safety standards will result in disciplinary action. Since the goal of the IIPP is to prevent workplace injuries and illnesses, the goal of the discipline procedure is to prevent safety violations that may lead to incidents. When employee safety violations occur, subsequent discipline should be progressive and be according to Department/Program and Civil Service policies. It is important to note that employees shall not be disciplined for having an industrial injury or illness, but rather for violating safety practices and procedures.

3.0 COMMUNICATION

We recognize that open, two-way communication between management and staff on health and safety issues is essential to an injury-free, productive workplace. The following system of communication is designed to facilitate a continuous flow of safety and health information between management and staff in a form that is readily understandable and consists of:

- New worker orientation including a discussion of safety and health policies and procedures.
- Review of our IIPP.
- Workplace safety and health training programs.
- Regularly scheduled safety meetings.
- Effective communication of safety and health concerns between workers and supervisors, including translation where appropriate.
- Posted or distributed safety information.
- A system for workers to anonymously inform management about workplace hazards.

3.1 Safety Meetings and Training Programs

Cal/OSHA regulations require “tailgate” safety meetings for field employees at least every 10 working days. Office workers should attend safety meetings periodically. Safety meetings provide an excellent forum to present a discussion of safety and health policies and procedures, review the IIPP, and provide new safety information, discuss recent incidents, request input from employees on safety hazards, and provide job-specific information. Management will hold periodic meetings with supervisory employees to discuss safety problems and recent incidents.

3.2 Safety Bulletin Boards

Work locations will designate a dedicated Safety Bulletin Board for posting safety and health information. These bulletin boards should be located where employees will see them, such as where they report for work, in lunchrooms or break areas, or in main lobbies or hallways. Remote facilities should have posting areas. Posted information may include:

- Cal/OSHA poster and OSHA 300a log (February 1 – April 30).
- Workers' Compensation Poster and Work Injury Notification Form.
- Designated Medical Treatment Facilities & Medical Provider Network.
- Emergency Phone Numbers.
- Access to Medical and Exposure Records Notification.
- Work Injury Notification Form.
- Safety Suggestion Forms – To anonymously notify management of safety hazards.
- Noise Standard and/or Industrial Truck (Forklift) Standard.
- Code of Safe Practices.
- Heat Illness Prevention Poster
- Needlestick Guidelines

3.3 Wellness and Safety Newsletter

Environmental Health and Safety will publish the Safe Place Newsletter quarterly. This newsletter can be used to publish:

- Office of the City Administrator-wide safety information.
- Wellness topics such as exercise and nutrition.
- Off-the-job safety information.

3.4 Code of Safe Practices

Cal/OSHA regulations require a written Code of Safe Practices that relates to the employer's operations. A Code of Safe Practices is a step-by-step procedure on how to perform a job safely. A Code of Safe Practices Booklet has been developed for operations that are common to many workplaces. However, each Department/Program must develop its own Code of Safe Practices for operations that are unique to that organization. The Code of Safe Practices shall be readily available to employees at each job site and be provided to each supervisor.

3.5 Hazard Reporting

Employees are encouraged to report unsafe conditions and practices and to contribute solutions for safety problems they identify. Employees must report emergency situations immediately to their supervisor or any available management representative. (The supervisor or management representative should notify the appropriate Manager or Director.) For non-emergency situations, two reporting channels may be used:

- The problem may be reported verbally to their supervisor or by use of a Safety Suggestion Form.
- Employees also may submit anonymous reports using the Safety Suggestion Form to the Safety Recordkeeper.

4.0 HAZARD ASSESSMENT

Inspections to identify and evaluate workplace hazards shall be performed initially and periodically and will be conducted of industrial facilities, offices, and field operations. The inspections will be conducted according to the following table.

4.1 Initial Hazard Surveys

Initial hazard surveys to identify and evaluate workplace hazards shall be performed when:

- The IIPP is initially established;
- New substances, processes, procedures, or equipment are introduced to the workplace;
- Management is made aware of a new or previously unrecognized hazard;
- When occupational injuries and illnesses occur;
- When we hire and/or reassign permanent or intermittent workers to processes, operations, or tasks for which a hazard evaluation has not been previously conducted; and
- Whenever workplace conditions warrant an inspection.

Periodic inspections consist of identification and evaluation of workplace hazards. The checklists in the Supervisor Safety Handbook or any other effective methods to identify and evaluate workplace may be used. Items that cannot be corrected immediately must be listed on the Hazard Log.

4.2 Periodic Inspections

Periodic inspections are a valuable tool to increase awareness of changes in the workplace, to emphasize safety and to identify and eliminate workplace hazards. Therefore, supervisors must conduct weekly walkthrough safety inspections of the area under their control and document items such as housekeeping, job changes, work practices, use of personal protective equipment, fire hazards, etc. Any potential hazards should be corrected immediately, if possible. Items that are not corrected immediately must also be listed on the Hazard Log. Where offices have many supervisors, they may choose to rotate responsibility for the safety inspections.

| TYPE | INSPECTION TEAM | FORMAT | FREQUENCY |
|-------------|-------------------------|---|-------------------------------------|
| Initial | EHS and Supervisor | Comprehensive review of facility and work practices | Initial |
| Periodic | Supervisor and Employee | Evaluate a new or existing process, procedure, equipment, substance, OR in response to Safety Suggestion Form | Weekly (field) or Periodic (office) |

5.0 INCIDENT REPORTING AND INVESTIGATION

5.1 Injury and Illness Reporting

It is the policy of the Office of the City Administrator that the employee must report workplace injuries and illnesses immediately to their supervisor. Reporting is required for any injury or illness, no matter how minor, which the employee has suffered during working hours while engaged in official business of the City. The employee shall report any injury no later than the scheduled end of the current workshift. The employee shall report any illness as soon as the employee is aware of it.

Under certain circumstances, Cal/OSHA notification of occupational injury or illness is **mandatory**. Therefore, if an employee is taken by ambulance to the hospital; is hospitalized; has any serious degree of permanent disfigurement (amputation, crushing, or severe burn); or dies:

- Call Cal/OSHA at 415-557-0100 **immediately** but no later than 8 hours after the employer learns of the incident. This notification may result in a Cal/OSHA enforcement investigation of the incident.

NOTE: Cal/OSHA notification is not required if the injury or death results from a traffic accident on a public street or highway.

For specific procedures for injury and illness reporting, refer to the Supervisor Safety Handbook.

5.2 Incident Investigations

When notified of a workplace incident, the supervisor of the injured employee must conduct an incident investigation. Procedures for investigating workplace incidents and hazardous substance exposures include:

- Visiting the incident scene as soon as possible;
- Interviewing injured workers and witnesses;
- Examining the workplace for factors associated with the incident/exposure;
- Determining the cause of the incident/exposure;
- Taking corrective action to prevent the incident/exposure from reoccurring; and
- Recording the findings and corrective actions taken.

The first line supervisor must make the initial investigation as soon as possible after the incident but no later than 48 hours. Incident investigations are required for occupational injuries or illnesses and for significant incidents of “near misses” where no actual injury occurred but the potential for injury and/or damage is severe. For specific procedures of conducting Incident Investigations, refer to the Supervisor Safety Handbook.

6.0 HAZARD CORRECTION

Unsafe or unhealthy work conditions; practices or procedures shall be corrected in a timely manner based on the severity of the hazards. Hazards shall be corrected according to the following procedures:

- When observed or discovered;
- When an imminent hazard exists which cannot be immediately abated without endangering employee(s) and/or property, we will remove exposed workers from the area except those necessary to correct the existing condition;
- Workers necessary to correct the hazardous condition shall be provided with the necessary protection; and
- Such actions taken and dates they are completed shall be documented on the appropriate forms. For specific procedures refer to the Supervisor Safety Handbook.

6.1 Hazard Log

Each Office of the City Administrator Department or Program will maintain a Hazard Log that will be used to track items needing correction. The Safety Recordkeeper will keep the log. The log should include any workplace hazards that have been identified from initial and periodic inspections, Safety Suggestion Forms, incident investigations, and through other mechanisms, such as Cal/OSHA visits or Department of Public Health inspections. Items on the log include date, location, priority (see Section 6.2), responsible person, anticipated completion date, and actual completion date. Figure 6.1 is a sample format for the log.

As items are entered on the Hazard Log, management will review each item to determine the priority, and responsible person. Management should also regularly review the log to determine the status of open items, and progress toward completion. Environmental Health and Safety will conduct periodic audits of the logs.

6.2 Priority System

Hazards must be prioritized in order to provide a consistent guide for corrective action, specify which hazardous conditions warrant immediate action and which have secondary priority, and to allocate funding to correct the worst hazards first. Interim controls will be implemented when hazards cannot be immediately corrected.

When an imminent hazard exists which cannot be immediately abated without endangering employee(s) and/or property, all exposed personnel shall 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.

Figure 6.1 - Sample Hazard Log

SAMPLE HAZARD LOG

| DATE AND SOURCE | DEPARTMENT / PROGRAM | LOCATION | DESCRIPTION OF HAZARDOUS CONDITION | CORRECTIVE ACTION | RESPONSIBLE PERSON | STATUS/ INTERIM CONTROL | COMPLETION DATE |
|--|----------------------|---------------|------------------------------------|---|--------------------|-------------------------|-----------------|
| 6/14/19 Safety Inspection by shop supervisor T.Jones | DT, Radio Shop | 200 Paul Ave. | Ungrounded tools and equipment | Provide receptacles with 3 prong outlets, test each to make certain it's grounded, make sure all tools have a grounding plug. | John Smith | Complete | 6/29/19 |

7.0 TRAINING

Workers, including managers and supervisors, shall have training and instruction on general and job-specific safety and health practices. Training and instruction shall be provided as follows:

- When the IIPP is first established;
- To new workers;
- To workers given new job assignments for which training has not previously provided;
- Whenever new substances, processes, procedures or equipment are introduced to the workplace and represent a new hazard;
- Whenever the employer is made aware of a new or previously unrecognized hazard;
- To supervisors to familiarize them with the safety and health hazards to which workers under their immediate direction and control may be exposed; and
- To workers with respect to hazards specific to each employee's job assignment.

Workplace safety and health practices include, but are not limited to, the following:

- Explanation of the IIPP, emergency action plan and fire prevention plan, and measures for reporting any unsafe conditions, work practices, injuries and when additional instruction is needed.
- Use of appropriate clothing, including gloves, footwear, and personal protective equipment.
- Information about chemical hazards to which employees could be exposed and other hazard communication program information.
- Availability of toilet, hand-washing and drinking water facilities. Proper housekeeping , such as keeping stairways and isles clear, work areas neat and orderly, and promptly cleaning up spills.
- Prohibiting horseplay, scuffling, or other acts that adversely influence safety.
- Proper storage to prevent:
 - stacking goods in an unstable manner
 - storing materials and good against doors, exits, fire extinguishing equipment and electrical panels.
- Provisions for medical services and first aid including emergency procedures.

In addition, we provide specific instructions to workers regarding hazards unique to their job assignment, to the extent that such information was not already covered in other training.

7.1 Training Topics

- Asbestos/Lead/Silica Awareness
- Confined Space Entry
- Defensive Driving
- Excavation Safety
- Electrical Safety & Lockout/Tagout
- Emergency Preparedness
- Forklift/Crane Safety
- Fall Protection
- Hazard Communication
- Hearing Conservation
- Heat Illness Prevention
- Infection Control/Bloodborne Pathogens
- IIPP
- Personal Protective Equipment
- Repetitive Motion Injury Prevention
- Respiratory Protection
- Traffic Control
- Workplace Violence Prevention

7.2 Training Plan

Office of the City Administrator Departments/Programs will incorporate health and safety trainings into their Department/Program training plans.

8.0 RECORDKEEPING

The Safety Recordkeepers will maintain the following records:

- Hazard assessment inspections, including the person(s) or persons conducting the inspection, the unsafe conditions and work practices that have been identified and the action taken to correct the identified unsafe conditions and work practices, are recorded on a hazard log; and
- Documentation of safety and health training for each worker, including the worker's name or other identifier, training dates, type(s) of training, and training providers on a sign-in sheet.

Inspection records and training documentation will be maintained for three years.

8.1 Access

We will make this written Injury and Illness Prevention Program available to employees or their authorized representatives upon request and within 5 business days.

- Employees can obtain a copy of this program on the Office of the City Administrator SharePoint site <https://sfgov1.sharepoint.com/sites/ADM-CityAdminHR-HeathandSafety>, or by asking for a printed copy from their Supervisor, Manager or EHS. Authorized representatives may request a copy of this document by contacting the Office of the City Administrator, Human Resources at CityAdminHR@sfgov.org or by calling (415) 554-6000.
- As part of New Employee Safety Orientation training, employees shall be informed of their right to access this program and how.