

INJURY & ILLNESS PREVENTION PROGRAM FOR SAN FRANCISCO HUMAN RIGHTS COMMISSION

OVERVIEW

California requires every California employer to establish, implement, and maintain a written Injury and Illness Prevention (IIP) Program and to maintain a copy at each worksite or at a central worksite if the employer has non-fixed worksites.

Title 8 of the California Code of Regulations, Section 3203 (T8 CCR 3203) contains the requirements for establishing, implementing, and maintaining an effective written Injury and Illness Prevention Program. There are eight elements:

1. Responsibility
2. Compliance
3. Communication
4. Hazard Assessment
5. Accident/Exposure Investigation
6. Hazard Correction
7. Training and Instruction
8. Recordkeeping

INJURY AND ILLNESS PREVENTION PROGRAM RESPONSIBILITY

Our Injury and Illness Prevention (IIP) Program administrator is:

Program Administrator has the authority and the responsibility for implementing and maintaining this IIP Program for:

San Francisco Human Rights Commission

Managers and supervisors are responsible for implementing and maintaining the IIP Program in their work areas and for answering worker questions about the IIP Program.

A copy of this IIP Program is available from each manager and supervisor.

COMPLIANCE

All workers, including managers and supervisors, are responsible for complying with safe and healthful work practices. Our system of ensuring that all workers comply with these practices include one or more of the following checked practices:

- Informing workers of the provisions of our IIP Program.
- Evaluating the safety performance of all 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.

COMMUNICATION

All managers and supervisors are responsible for communicating with all workers about occupational safety and health in a form readily understandable by all workers. Our communication system encourages all workers to inform their managers and supervisors about workplace hazards without fear of reprisal.

Our communication system includes one or more of the following checked items:

- New worker orientation including a discussion of safety and health policies and procedures.
- Review of our IIP Program.
- Training programs.
- Regularly scheduled safety meetings.
- Posted or distributed safety information.
- A system for workers to anonymously inform management about workplace hazards.
- Our establishment has less than ten employees and communicates with and instructs employees orally about general safe work practices and hazards unique to each employee's job assignment.

HAZARD ASSESSMENT

Periodic inspections to identify and evaluate workplace hazards shall be performed by a competent observer in the following areas of our workplace:

Work Areas

Kitchens

Conference Rooms

Hallways

Periodic inspections are performed according to the following schedule (Check all that apply.):

- When we initially established our IIP Program;
- When new substances, processes, procedures or equipment which present potential new hazards are introduced into our workplace;
- When new, previously unidentified hazards are recognized;
- When occupational injuries and illnesses occur; and
- Whenever workplace conditions warrant an inspection.

ACCIDENT/EXPOSURE INVESTIGATIONS

Procedures for investigating workplace accidents and hazardous substance exposures include (Check all that apply.):

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

HAZARD CORRECTION

We will correct unsafe or unhealthy work conditions, practices or procedures in a timely manner based on the severity of the hazards. Hazards shall be corrected according to the following procedures:

1. When observed or discovered; and
2. When an imminent hazard exists that cannot be immediately abated without endangering employee(s) and/or property, we will remove all exposed workers from the area except those necessary to correct the existing condition.

We will provide workers who are required to correct the hazardous condition with the necessary protection.

TRAINING AND INSTRUCTION

All workers, including managers and supervisors, shall have training and instruction on general and job-specific safety and health practices. Training and instruction is provided:

- When the IIP Program is first established;
- To all new workers (except for construction workers who are provided training through a construction industry occupational safety and health training program approved by Cal/OSHA);
- To all 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 all workers with respect to hazards specific to each employee's job assignment.

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

- Implementation and maintenance of the IIP Program.
- Emergency action and fire prevention plan.
- Provisions for medical services and first aid including emergency procedures.
- Prevention of musculoskeletal disorders, including proper lifting techniques.
- Proper housekeeping, such as keeping stairways and aisles clear, work areas neat and orderly, and promptly cleaning up spills.
- Prohibiting horseplay, scuffling, or other acts that tend to adversely influence safety.
- Proper storage to prevent stacking goods 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 toxic and hazardous substances that includes a prohibition against eating or storing food and beverages in areas where they can become contaminated.

RECORDKEEPING

We have checked one of the following categories as our recordkeeping policy.

- Category 1.** Our establishment has twenty or more workers or has a workers' compensation experience modification rate of greater than 1.1 and is not on a designated low hazard industry list. We have taken the following steps to implement and maintain our IIP Program:

1. Records of hazard assessment inspections, including the person(s) 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 assessment and correction form; and
2. 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 are recorded on a worker training and instruction form.

Inspection records and training documentation will be maintained according to the following checked schedule:

- For one year, except for training records of employees who have worked for less than one year which are provided to the employee upon termination of employment; or
- Since we have less than ten workers, including managers and supervisors, we only maintain inspection records until the hazard is corrected and only maintain a log of instructions to workers with respect to worker job assignments when they are first hired or assigned new duties.

Category 2. Our establishment has fewer than twenty workers and is not on a designated high hazard industry list. We are also on a designated low hazard industry list or have a workers' compensation experience modification rate of 1.1 or less, and have taken the following steps to implement and maintain our IIP Program:

- 1. Records of hazard assessment inspections; and**
- 2. Documentation of safety and health training for each worker. Inspection records and training documentation will be maintained according to the following checked schedule:**

- For one year, except for training records of employees who have worked for less than one year which are provided to the employee upon termination of employment; or**
- Since we have less than ten workers, including managers and supervisors, we maintain inspection records only until the hazard is corrected and only maintain a log of instructions to workers with respect to worker job assignments when they are first hired or assigned new duties.**

Category 3. We are a local governmental entity (county, city, district, or any public or quasi-public corporation or public agency) and we are not required to keep written records of the steps taken to implement and maintain our IIP Program.

HAZARD ASSESSMENT AND CORRECTION RECORD

Date of Inspection: _____ Person Conducting Inspection: _____

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| Unsafe Condition or Work Practice: |
| Corrective Action Taken: |

Date of Inspection: _____ Person Conducting Inspection: _____

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| Unsafe Condition or Work Practice: |
| Corrective Action Taken: |

Date of Inspection: _____ Person Conducting Inspection: _____

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|---|
| Unsafe Condition or Work Practice: |
| Corrective Action Taken: |

ACCIDENT/EXPOSURE INVESTIGATION REPORT

Date & Time of Accident:

Location:

Accident Description:

Workers Involved:

Preventive Action Recommendations:

Corrective Actions Taken:

Manager Responsible:

Date Completed

Appendix A: Model Policy Statements

“The Occupational Safety and Health Act of 1970, clearly states our common goal of safe and healthful working conditions to be the first consideration in operating this business.”

“Safety and health in our business must be part of every operation. Without questions, it is every employee’s responsibility at all levels.”

“It is intent of this company to comply with all laws. To do this, we must constantly be aware of conditions in all work areas that can produce injuries. No employee is required to work at a job he/she knows is not safe or healthful. Your cooperation in detecting hazards and, in turn, controlling them, is a condition of your employment. Inform your supervisor immediately of any situation beyond your ability or authority to correct.”

“The personal safety and health of each employee of this company is of primary importance. Prevention of occupationally induced injuries and illnesses is of such consequence that it will be given precedence over operating productivity, whenever necessary. To the greatest degree possible, management will provide all mechanical and physical activities required for personal safety and health, in keeping with the highest standards.”

“We will maintain a safety and health program conforming to the best practices of organizations of this type. To be successful, such a program must embody proper attitudes toward injury and illness prevention on the part of supervisors and employees. It also requires cooperation in all safety and health matters, not only between supervisor and employee, but also between each employee and his/her co-workers. Only through such a cooperative effort can a safety program in the best interest of all be established and preserved.”

“Our objective is a safety and health program that will reduce the number of injuries and illnesses to an absolute minimum, not merely in keeping with, but surpassing, the best experience of operations similar to ours. Our goal is zero accidents and injuries.”

“Our safety and health program will include:

- **Providing mechanical and physical safeguards to the maximum extent possible.**
- **Conducting safety and health inspections to find, eliminate or control safety and health hazards as well as unsafe working conditions and practices, and to comply fully with the safety and health standards for every job.**
- **Training all employees in good safety and health practices.**
- **Providing necessary personal protective equipment and instructions for use and care.**
- **Developing and enforcing safety and health rules, and requiring that employees cooperate with these rules as a condition of employment.**
- **Investigating, promptly and thoroughly, every accident to find out what caused it and correct the problem so it will not happen again.**
- **Setting up a system of recognition and awards for outstanding safety service or performance.”**

“We recognize that the responsibilities for safety and health are shared:

- **The employer accepts the responsibilities for leadership of the safety and health program, for its effectiveness and improvement, and for providing the safeguards required to ensure safe conditions.**
- **Supervisors are responsible for developing proper attitude toward safety and health in themselves and in those they supervise, and for ensuring that all operations are performed with the utmost regard for the safety and health of all personnel involved, including themselves.**

Employees are responsible for wholehearted, genuine operation of all aspects of the safety and health program-including compliance with all rules and regulations and for continuously practicing safety while performing their duties.”