

Injury and Illness Prevention Program

Approved by: Cabinet

It is the policy of the Keck Graduate Institute (KGI) to provide a safe and healthy workplace environment for all employees and to ensure compliance with all workplace safety regulations set forth by *Title 8 of the California Code of Regulations*. This policy is extended to all employees, students, outside contractors, and visitors.

The *Injury and Illness Prevention Program* (I/PP) serves as the key guidance document for all employees to ensure compliance with Cal/OSHA regulations, California Code of Regulations, Title 8, Section 3203. It is also the key guidance document for the structure of the *KGI Health and Safety Program*. This is the basis for the prevention of injuries and exposures which are critical to reducing worker's compensation costs and enabling a "Best Practices Safety Culture" with a goal of zero accidents.

The Eight Components of the Injury Illness Prevention Program

The I/PP is made up of eight parts as required by Title 8 of the California Code of Regulations Section (3 203):

1. Responsible Person: Person responsible for implementing the I/PP
2. Employee Compliance with Safety Procedures: System for ensuring employee compliance of Health and Safety Workplace Practices
3. Communication with Employees Regarding Safety: Method of communication with employees regarding workplace safety
4. Hazard Assessment: Procedure for identifying and evaluating workplace hazards
5. Hazard Correction: Procedure for correcting unsafe/ unhealthy conditions, practices, and procedures
6. Occupational Injury and Illness Investigation: Procedure for investigating workplace injuries/illnesses
7. Employee Training and Instruction: Procedure for training employees as outlined in Title 8 of the California Code of Regulations
8. Record keeping and Employee Access to Medical Records: Procedure for maintaining records for all medical procedures, test results, and training provided as well as allowing employees access to all medical records, test results, and training

Responsible Persons

KGI's Injury and Illness Prevention Program Administrator(s) are:

- Cheryl Merritt, AVP Human Resources and Employee Engagement
- Jasmine Yu, Laboratory Safety Manager
- Trevor Garrett, AVP Financial Planning & Analysis

For questions regarding the content of the Injury and Illness Prevention Program, I/PP Administrator(s) may be contacted at
cmerritt@kgi.edu, jyu@kgi.edu, tgarrett@kgi.edu

The Responsibilities of the I/PP Administrator(s) include:

- Prepare and update KGI's I/PP
- Implement the provisions in the I/PP
- Investigate accidents, injuries, illnesses, and exposures in the workplace
- Ensure routine workplace hazard identification inspections are conducted
- Mitigate identified workplace hazards
- Provide health and safety training to employees
- Institute a Safety Committee
- Establish a procedure for employees to report workplace hazards, accidents, injuries, illnesses, and general safety concerns
- Ensure all employees can identify the Injury Illness Prevention Program Administrator(s)

Employee Compliance with Safety Procedures

Management is responsible for ensuring that all health and safety policies and procedures are clearly communicated and understood by all employees. Supervisors and lead personnel are expected to enforce the rules fairly and uniformly.

All KGI employees, including supervisors, are responsible for complying with established safe workplace practices. The KGI system of ensuring all employees comply with these safe workplace practices includes the following:

- Inform employees of the provisions of the I/PP
- Recognize employees who perform safe workplace practices. (This recognition is accomplished by the employee's immediate Supervisor, Human Resources Department, or a Safety Committee Member)
- Fair and consistent discipline for employees who fail to comply with safe workplace practices

The following outlines KGI's disciplinary process:

- Verbal warning with additional safety training, if required
- Written warning
- Other necessary actions deemed appropriate by employee's immediate supervisor
- Evaluate the safety performance of all employees
- Provide training for employee whose safety performance is deficient

The responsibilities of supervisors and managers include the following:

- Implement EH&S policies, safe practices, and written programs
- Complete all required EH&S training
- Conduct hazard assessments for all hazardous work
- Establish written procedures specific to work or research activities

- Conduct regular safety and housekeeping inspections
- Hold frequent safety meetings with personnel
- Provide and require use of hazard controls and personal protective equipment where applicable
- Encourage employees to report health/safety concerns and make it known there will be no reprisal for these reports
- Respond to employee safety concerns and implement corrective actions promptly
- Evaluate the safety performance of all employees
- Recognize individuals who work in a safe manner and correct/discipline those who do not
- Stop any work that poses an imminent hazard (likelihood of injury, destruction of property, or death if not discontinued immediately) to personnel, other individuals, or the environment
- Assign appropriate safety training to employees prior to beginning work, retrain when they do not demonstrate good safe practices, and implement routine/continuous training, when required
- Provide access to and train personnel on the emergency evacuation plan and demonstrate how to locate the assigned assembly areas
- Report all occupational injuries, illnesses, safety concerns, and incidents to EH&S
- Conduct initial injury and incident investigations promptly so as to determine root cause and implement corrective actions in order to prevent future incidents

The responsibilities of all employees, students, outside contractors, and visitors include the following:

- Report unsafe conditions, workplace practices, incidents, near miss incidents, or injuries to immediate Supervisor or Human Resources Department immediately
- Follow all EH&S policies, safe practices, and written programs, as well as specific safety policies implemented for the specific area
- Use hazard controls and personal protective equipment required and as trained by supervisors
- Complete all required safety training prior to beginning work or as assigned by supervisors or Human Resources Department
- Participate in all safety meetings as assigned by supervisor
- Read and follow all health and safety-related signs, posters, warning signals, and directions
- Become familiar with building emergency plans and assembly areas for assigned work areas
- Cooperate with and assist in accident and incident investigations, as necessary

Communication with Employees Regarding Safety

All supervisors are responsible for communicating with their employees about occupational health and safety hazards and safeguards to all employees. The KGI employee communication system includes the following:

- New employee orientation which includes KGI's Health and Safety Policies and Procedures and a review of our Injury and Illness Prevention Program.
- A system for employees to anonymously inform management of workplace hazards without fear of reprisal.

- Employees may report unsafe workplace conditions through any of the following methods:
 - Inform their immediate Supervisor
 - Inform Laboratory Safety Manager
 - Inform a member of the Safety Committee
 - Call the EHS Department Hot-line 909.607.4EHS or 909.621.8538
 - Email the Human Resources Department: HR@kgi.edu
 - Fill out "Unsafe Condition Report," (Attachment 1) and submit to the Human Resources Department
- Regularly scheduled safety meetings held quarterly or as deemed necessary by the identification of hazards or the frequency of injuries and illnesses.
- Other methods used to communicate with employees including e-mails, KGI website, department postings and newsletters, handouts, posters/fliers, and safety meetings.
- Our workplace elects to use a labor/management health and safety committee to maintain the communication requirements of the I/PP standard. As required, the committee meets regularly (quarterly, at minimum), to conduct the following:
 - Prepare written records of the safety and health committees' meetings
 - Review results of the periodic scheduled inspections
 - Review investigations of accidents and exposures and makes suggestions to management for the prevention of future incidents
 - Review investigations of alleged hazardous conditions and submits recommendations to assist in the evaluation of employee safety recommendations

The KGI Safety Committee is responsible for reviewing and making recommendations on safety matters and specific areas of environmental, safety or health concerns.

Hazard Assessment

Periodic inspections to identify and evaluate hazards in our workplace will be performed by the following individual(s):

- Chemical and Biological Safety Committee
- Department Supervisors
- Department Leads
- Employees

Periodic inspections are performed according to the following schedule:

- When new substances, processes, procedures, or equipment are introduced into the workplace which may present the potential for new hazards.
- When new, previously unidentified hazards are recognized
- When occupational injuries and illnesses occur
- When workplace conditions warrant an inspection
- When permanent or intermittent employees are hired and/or reassigned to perform processes, operations, or tasks for which a hazard evaluation has not been previously conducted
- Daily by employees and quarterly by supervisors

- Annually by Safety Committee

Employees are responsible for inspecting tools, equipment, and work areas to identify safety hazards on a daily basis. In addition, employees are responsible for reporting workplace hazards to their immediate supervisor, Team Lead, EH&S Department, or Safety Committee Member.

Supervisors are responsible for conducting daily inspections of work areas/operations, conducting quarterly safety inspections, and following up on identified workplace hazards and corrections.

Supervisors may fill out Unsafe Condition Report (See Attachment 1) and submit it to EH&S Department or Central Facilities Services.

Hazard Correction

Unsafe work conditions, practices, or procedures will be corrected in a timely manner based on the severity of the hazards. Corrective action is to be taken:

- When a hazard is observed or as soon as it is discovered.
- When an imminent hazard exists, which cannot be immediately abated without endangering employee(s) and/or property, in which case all exposed employees will be removed from the area except those necessary to correct the existing condition. (Employees who are required to correct the hazardous condition will be provided with the necessary protection and training).
- When policies for addressing hazards identified in the workplace have been established for the following:
 - Safety
 - Chemical Safety
 - Radiation Safety
 - Laser Safety
 - Laboratory & Research Safety
 - Hazardous Waste Management
 - Electrical Hazard Management
 - Emergency Management
 - Asbestos Management
 - Risk Management
 - Confined Space
 - Ergonomics

All safety hazards shall be reported and documented with corrective actions initiated promptly. Many hazards can be corrected by the Department Supervisor. Other hazards will require work orders and written communications to Central Facilities Services or EH&S Department (See Attachment 1).

Halting Operations

Authorized personnel as identified in the KGI Employee Health and Safety Handbook shall have the authority to order a stop to any activity which presents an immediate threat to life, safety, or property. When such a hazard is encountered, the KGI's President and Cabinet Members, Facilities Director, the Department Supervisor, and Laboratory Safety Manager (in case of lab related incidents) shall be notified immediately.

CAL OSHA prohibits an employer from taking adverse action against any employee for reporting workplace safety hazards. Employees are required to report all safety hazards.

Occupational Injury and Illness Investigations

Investigations of workplace accidents, injuries, illnesses, and hazardous substance exposures will be conducted by:

Jasmine Yu, Laboratory Safety Manager.

Our procedures for investigating accidents, injuries, and illnesses and hazardous substance exposures include the following:

- Visit the scene as soon as possible.
- Interview injured employee(s) and witness(es).
- Determining the cause(s) of the accident/exposure.
- Take corrective action to prevent the accident/exposure from reoccurring.
- Identify and address the underlying factor(s) which contributed to the incident.
- Investigate "near miss" incidents when they occur.
- Record all findings and actions taken.
- Take photographs of the accident scene and the employee(s) involved.

Department Supervisors are required to fill out a Supervisor Accident Investigation Report (See Attachment 3) and submit to Human Resources.

Employee Training and Instruction

All employees, including supervisors, are provided training and instruction on general and job-specific Health and Safety Practices. Training and instruction are provided in the following instances:

- Upon implementation of a new I/PP.
- At time of new employee hire.
- When existing employees are given new job assignments for which training has not previously been provided.
- When new substances, processes, procedures, or equipment are introduced into the workplace and represent a new hazard.
- When anyone is made aware of a new or previously unrecognized hazard.
- When training of supervisors is conducted in order to familiarize such individuals with health and safety hazards to which employees under their immediate direction and control may be exposed to.
- When training is conducted for employees for the purpose of recognizing specific hazards unique to each employee's job assignment.

We provide training to employees and supervisors on topics such as but not limited to:

- Accident Prevention Signs and Tags
- Emergency action plan
- Ergonomics

- Fire prevention plan
- Hazard communication
- Injury illness prevention program
- Job hazards
- Employee access to medical and exposure record
- OSHA California Posting Requirements.

Training shall be conducted in one (or more) of the following manners:

- In-person Safety Training
- Online self-paced Safety Training. See Attachment 4 for a copy of the Training Roster.

Record Keeping and Employee Access to Medical Records

KGI employs more than 10 employees and maintains the following records to help effectively implement I/PP:

- Records of scheduled and periodic inspections (to identify unsafe conditions, and work practices, including the names of the person(s) conducting the inspection, the unsafe conditions and the work practices that have been identified, as well as the action(s) taken to correct the identified unsafe conditions and work practices). These records are retained for a minimum of one (1) year.
- Documentation of our Health and Safety Training for each worker, including their name, training date(s), types of training, and the name(s) of our training provider(s).

The following records will be retained for the minimum length of time indicated below:

Record:	Retained by:	Retained for:
Safety inspection records	Department and HR	5 Years
Hazard Identification forms on paper	Department and HR	5 Years
Injury reports and accident investigations	Worker's Compensation	5 Years
Employee training documents on paper or online	Department and HR	Duration of Employment
Safety meeting agendas	Department	5 Years
Employee exposure records, registered carcinogen records, or other required employee health and safety records	HR and Worker's Compensation	30 years or the duration of employment if longer

The master copy of this I/PP can be found at: Human Resources Department (hard copy), internal shared drive (electronic copy). Other copies of the I/PP can be found at: the KGI website, kgi.edu.

I/PP Attachment 1

Unsafe Condition Report

This form is to be completed by employees and returned to their supervisor. This form must reach the department no later than one (1) day after completion for serious unsafe conditions and no more than three (3) days for other unsafe conditions. Conditions which may cause immediate injury should be reported to your supervisor by phone immediately.

Date:

Time:

From:

Department:

(Name of person fill out form and job title)

I estimate this unsafe condition is: (check one)

Life Threatening

Serious

Minor

Describe unsafe condition location:

List any equipment model numbers and identification numbers for equipment, buildings, etc. involved in unsafe condition:

Discussed with supervisor on name/date/time

Action taken by supervisor to correct hazard/date:

NO EMPLOYEE will be retaliated against for reporting hazards or potential hazards or for making suggestions related to safety.

Important

It is very important to investigate the accident as opposed to the results of the accident. For example, you are not investigating a broken arm, but the factors leading to it. An accident or incident can be a fall, slip, trip, slide, strike against or other contact, being caught in or between, eruption or explosion, burn, or improper movement. Results can range from a simple annoyance to a fatality.

The examples of corrective actions are designed to help you determine some possible actions. It is important that some effective action is taken, including improving management systems and personal performance as management personnel. This is not intended to indict, but to effect realist corrective action.

What actions can prevent a recurrence? (Use this information to help your thought process while attempting to determine all possible contributing factors)		Consider these possible actions, but do not limit yourself. There are numerous possible combinations, and serious thought will be needed to be effective.
1. Contributing causes of accidents/incidents		
1. Supervisory Safety Performance		
1. Inadequate or incomplete instruction		Enhance training and follow-up
2. Safe and healthful work practices not enforced		Stronger and more consistent enforcement
3. Safety not planned as part of job		Make safety considerations part of planning any job
4. Infrequent associate safety contacts		Talk about frequently with associates
5. Inadequate or incomplete hazard correction		Document completion of corrections for identified hazards
6. Safety devices not provided		Assure safety devices present and enforce use
2. Mental or Emotional Condition of Associate		
1. Lack of awareness		Evaluate training tactics
2. Inattention		Find out why
3. Improper attitude lack of (safety cooperation, etc.)		Use behavior modification, incl. discipline if necessary
4. Nervous		Find out why
3. Physical Condition of Person		
1. Fatigue		Evaluate for personal problems or needed shift adjustment
2. Deafness or poor hearing		Modify job per ADA requirements or evaluate placement
3. Poor eyesight		Modify job per ADA requirements or evaluate placement
4. Associate not physically matched to the job		Modify job per ADA requirements or evaluate placement
5. Physically challenged		Modify job per ADA requirements or evaluate placement
2. Immediate cause of accident/incidents		
1. Unsafe acts		
1. Protective equipment or guard provided, but not used		Evaluate rules and correct training and enforcement tactics
2. Poor handling (i.e.: not allowing for sharp or slippery surfaces, poor lifting, etc.)		Evaluate rules and correct training and enforcement tactics

What actions can prevent a recurrence? (Use this information to help your thought process while attempting to determine all possible contributing factors)	Consider these possible actions, but do not limit yourself. There are numerous possible combinations, and serious thought will be needed to be effective.
3. Proper tools/equipment provided, but not used	Evaluate rules and correct training and enforcement tactics
4. Hazardous movement (i.e.: running, jumping, climbing, etc.)	Evaluate rules and correct training and enforcement tactics
5. Horseplay	Evaluate rules and correct training and enforcement tactics
2. Unsafe conditions	
1. Absent or ineffective safety device	Determine current requirements and update, if necessary
2. Poor housekeeping	Upgrade and enforce housekeeping standards
3. Defective machines, equipment, or tools	Determine current requirements and update, if necessary
4. Improper dress or apparel for the job	Evaluate, upgrade, and enforce safe dress standards
5. Poor illumination, ventilation, etc.	Upgrade and/or repair

I/PP Attachment 2

Employee's Report of Injury Form

Instructions: Employees shall use this form to report all work-related injuries, illnesses, or “near miss” events (which could have caused an injury or illness)-no matter how minor. This helps us to identify and correct hazards before they cause serious injuries. This form shall be completed by employees as soon as possible and given to a supervisor for further action.

I am reporting a work related: Injury Illness Near Miss

Your name:

Job Title:

Supervisor:

Have you told your supervisor about this injury/near miss? Yes No

Date of injury/near miss: Time of injury/near miss:

Name of witnesses (if any):

Where, exactly, did it happen?

What were you doing at the time?

Describe step by step what led up to the injury/near miss. (continue on the back if necessary):

What could have been done to prevent this injury/near miss?

What parts of your body were injured? If a near miss, how could you have been hurt?

Did you see a doctor about this injury/illness? Yes No

If yes, whom did you see? Doctor's phone number:

Date: Time:

Has this part of your body been injured before? Yes No

If yes, when? Supervisor:

Your Signature: Date:

I/PP Attachment 3

Supervisor's Accident Investigation Form

Name of Injured Person:

Date of Birth:

Telephone Number:

Address:

City:

State:

Zip:

(Check one) Male Female

What part of the body was injured? Describe in detail.

What was the nature of the injury? Describe in detail.

Describe fully how the accident happened? What was the employee doing prior to the event?
What equipment were being used?

Names of all witness:

Date of event:

Time of event:

Exact location of event:

What caused the event:

Were safety regulations in place and used? If not, what was wrong?

Employee went to doctor/hospital?

Yes

No

Doctors Name:

Hospital Name:

Recommended preventative action to take in future to prevent recurrence:

Supervisor Signature:

Date:

Incident Investigation Report

Instructions: Complete this form as soon as possible after an incident that results in serious injury or illness.
(Optional: Use to investigate a minor injury or near miss that could have resulted in a serious injury or illness.)

This is a report of a: Death Lost Time Dr. Visit Only First Aid Only Near Miss

Date of incident: This report is made by: Employee Supervisor Team Other

Step 1: Injured employee (complete this part for each injured employee)

Name: Sex: Male Female Age:

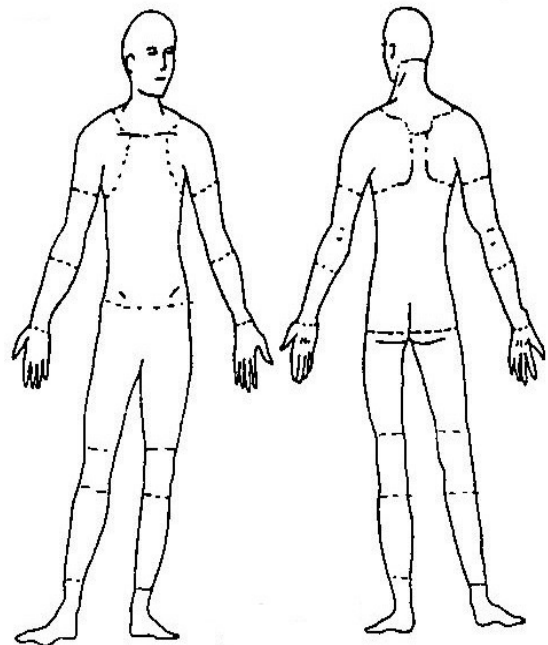
Department: Job title at time of incident:

This employee works: Regular full time Regular part time Seasonal

Nature of injury: (most serious one)

Abrasion, scrapes
Amputation
Broken bone
Bruise
Burn (heat)
Burn (chemical)
Concussion (to the head)
Crushing Injury
Cut, laceration, puncture
Hernia
Illness
Sprain, strain
Damage to a body system
Other

Part of body affected: (shade all that apply)



Step 2: Describe the incident

Exact location of the incident:

Exact time:

What part of employee's workday?

Entering or leaving work

Doing normal work activities

During meal period

During break

Working overtime

Other

Names of witness(if any):

Number of attachments:

Written witness statements:

Photographs:

Maps/drawings:

Describe, step-by-step the events that led up to the injury. Include names of any machines, parts, objects, tools, materials, and other important details.

Step 3: Why did the incident happen?

Unsafe workplace conditions: (Check all that apply)

Inadequate guard

Unguarded hazard

Safety device is defective

Tool or equipment defective

Workstation layout is hazardous

Unsafe lighting

Unsafe ventilation

Lack of needed personal protective equipment

Lack of appropriate equipment / tools

Unsafe clothing

No training or insufficient training

Other

Unsafe acts by people: (check all that apply)

Operating without permission

Operating at unsafe speed

Servicing equipment that has power to it

Making a safety device inoperative

Using defective equipment

Using equipment in an unapproved way

Unsafe lifting

Taking an unsafe position or posture

Distraction, teasing, horseplay

Failure to wear personal protective equipment

Failure to use the available equipment / tools

Other

Why did the unsafe conditions exist?

Why did the unsafe acts occur?

Is there a reward (such as "the job can be done more quickly," or the "the products is less likely to be damaged") that may have encouraged the unsafe conditions or acts? Yes No

If yes, describe:

Were the unsafe acts of conditions reported prior to the incident? Yes No

Have there been similar incidents or near misses prior to this one? Yes No

Step 4: How can future incidents be prevented?

What changes do you suggest to prevent this incident/near miss from happening again?

Stop this activity Guard the hazard Train the employee(s) Train the supervisor

Redesign task steps Redesign work station Write a new policy/rule

Enforce existing policy Routinely inspect for the hazard Personal protective equipment

Other:

What should be (or has been) done to carry out the suggestion(s) checked above?

Step 5: How can future incidents be prevented?

Written by: Title:

Department: Date:

Name of investigation team members:

Reviewed by: Title:

Date:

Training Roster

Location:

Training Subject:

[illegible]

18