

# Injury and Illness Prevention Program (IIPP)

Adapted from Cal/OSHA Workplace Injury & Illness Prevention Model Program for Non-high Hazard Employers CS-1B

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### General Industry Safety Order 3203

- (a) Effective July 1, 1991, every employer shall establish, implement, and maintain an effective Injury and Illness Prevention Program. The Program shall be in writing and, shall, at a minimum:
  - (1) Identify the person or persons with authority and responsibility for implementing the Program.
  - (2) Include a system for ensuring that employees comply with safe and healthy work practices. Substantial compliance with this provision includes recognition of employees who follow safe and healthful work practices, training and retraining programs, disciplinary actions, or any other such means that ensures employee compliance with safe and healthful work practices.
  - (3) Include a system for communicating with employees in a form readily understandable by all affected employees on matters relating to occupational safety and health, including provisions designed to encourage employees to inform the employer of hazards at the workplace without fear of reprisal. Substantial compliance with this provision includes meetings, training programs, posting, written communications, a system of anonymous notification by employees about hazards, labor/management safety and health committees, or any other means that ensures communication with employees.

Exception: Employers having fewer than 10 employees shall be permitted to communicate to and instruct employees orally in general safe work practices with specific instructions with respect to hazards unique to the employee's job assignments as compliance with subsection (a)(3).

- (4) Include procedures for identifying and evaluating workplace hazards including periodic scheduled inspections to identify unsafe conditions and workplace practices. Inspections shall be made to identify and evaluate hazards:
  - (A) When the program is first established;

Exception: Those employers having in place on July 1, 1991, a written Injury and Illness Prevention Program complying with previously existing section 3203.

- (B) Whenever new substances, processes, procedures, or equipment are introduced to the workplace that represent a new occupational safety and health hazard; and
- (C) Whenever the employer is made aware of a new or previously unrecognized hazard.
- (5) Include a procedure to investigate occupational injury or occupational illness.
- (6) Include methods and/or procedures for correcting unsafe or unhealthy conditions, work practices and work procedures in a timely manner based on the severity of the hazard;
  - (A) When observed or discovered; and,
  - (B) When an imminent hazard exists which cannot be immediately abated without endangering employee(s) and/or property, remove all exposed personnel from the area except those necessary to correct the existing condition. Employees

necessary to correct the hazardous condition shall be provided with the necessary safeguards.

- (7) Provide training and instruction:
  - (A) When the program is first established;

Exception: Employers having in place on July 1, 1991, a written Injury and Illness Prevention Program complying with the previously existing Accident Prevention Program in Section 3203.

- (B) To all new employees;
- (C) To all new employees given a job assignment for which training has not previously been received;
- (D) Whenever new substances, processes, procedures, or equipment are introduced to the workplace and represent a new hazard; and,
- (E) Whenever the employer is made aware of a previously unrecognized hazard; and,
- (F) For supervisors to familiarize themselves with the safety and health hazards to which employees under their immediate direction and control may be exposed.
- (8) Allow employees access to the Program.
  - (A) As used in this subsection:
    - 1. The term "access" means the right and opportunity to examine and receive a copy.
    - 2. The term "designated representative" means any individual or organization to whom an employee gives written authorization to exercise a right of access to the Program.
    - 3. The term "written authorization" means a request provided to the employer containing the following information:
      - a. The name and signature of the employee authorizing a designated representative to access the Program on the employee's behalf;
      - b. The date of the request;
      - c. The name of the designated representative (individual or organization) authorized to receive the Program on the employee's behalf; and,
      - d. The date upon which the written authorization will expire (if less than one (1) year).
  - (B) The employer shall provide access to the Program by doing one of the following:
    - 1. Provide access in a reasonable time, place, and manner, but in no event later than five (5) business days after the request for access is received from an employee or designated representative.
      - a. Whenever an employee or designated representative requests a copy of the Program, the employer shall provide the requester with a printed copy of the Program, unless the employee or designated representative agrees to receive an electronic copy of the Program.

- b. One copy of the Program shall be provided free of charge. If the employee or designated representative requests additional copies of the program within one (1) year of the previous request and the Program has not been updated with new information since the prior copy was provided, the employer may charge reasonable, non-discriminatory reproduction costs (per Section 3204(e)(1)(E)) for additional copies. Or,
- Provided unobstructed access through a company server or website, which allows an employee to review, print, and email the current version of the Program. Unobstructed access means that the employee, as part of their regular work duties, predictably and routinely uses the electronic means to communicate with management or coworkers.
- (C) The Program provided to the employee or designated representative need not include any of the records of the steps taken to implement and maintain the written program.
- (D) If an employer has distinctly different and separate operations with distinctly different and separate different Programs, the employer may limit access to the Program (or Programs) if applicable to the employee requesting it.
- (E) The employer shall communicate the right and procedure to access the Program to all employees.
- (F) Nothing in this section is intended to preclude employees and collective bargaining agents from collectively bargaining to obtain access to information in addition to that available under this section.
- (b) Records of the steps taken to implement and maintain the Program shall include:
  - (1) Records of scheduled and periodic inspections required by subsection (a)(4) to identify unsafe and unsanitary conditions and work practices, including person(s) conducting the inspection, the unsafe conditions and work practices that have been identified and action taken to correct the identified unsafe conditions and work practices. These records shall be maintained for at least one (1) year; and

Exception: Employers with fewer than 10 employees may elect to maintain the inspection records only until the hazard is corrected.

(2) Documentation of safety and health training required by subsection (a)(7) for each employee, including employee name or other identifier, training dates, type(s) of training, and training providers. This documentation shall be maintained for at least one (1) year.

Exception No. 1: Employers with fewer than 10 employees can substantially comply with the documentation provision by maintaining a log of instructions provided to the employee with respect to hazards unique to the employees' job assignment when first hired or assigned new duties.

Exception No. 2: Training records of employees who have worked for less than one (1) year for the employer need not be retained beyond the term of employment if they are provided to the employee upon termination of employment.

Exception No. 3: For Employer's with fewer than 20 employees who are in industries that are not on a designated list of high-hazard industries established by the Department of Industrial Relations (Department) and who have a Worker's Compensation Experience Modification Rate of 1.1 or less, and for any employers with fewer than 20 employees who are in industries on a designated list of low-hazard industries established by the Department, written documentation of the Program may be limited to the following requirements:

- A. Written documentation of the identity of the person or persons with authority and responsibility for implementing the program as required by subsection (a)(1).
- B. Written documentation of scheduled periodic inspections to identify unsafe conditions and work practices as required by subsection (a)(4).
- C. Written documentation of training and instruction as required by subsection (a)(7).

Exception No. 4: Local government entities (any county, city, city and county, or district, or any quasipublic corporation or public agency therein, including any public entity, other than a state agency, that is a member of, or created by, a joint powers agreement) are not required to keep records concerning the steps taken to implement and maintain the Program.

Note 1: Employers determined by the Division to have historically utilized seasonal or intermittent employees shall be deemed in compliance with respect to the requirements for a written Program if the employer adopts the Model Program prepared by the Division and complies with the requirements set forth therein.

Note 2: Employers in the construction industry who are required to be licensed under Chapter 9 (commencing with Section 7000) of Division 3 of the Business and Professions Code may use records relating to employee training provided to the employer in connection with an occupational safety and health training program approved by the Division, and shall only be required to keep records of those steps taken to implement and maintain the program with respect to hazards specific to the employee's job duties.

- (c) Employers who elect to use a labor/management safety and health committee to comply with the communication requirements of subsection (a)(3) of this section shall be presumed to be in substantial compliance with subsection (a)(3) if the committee:
  - (1) Meets regularly, but not less than quarterly;
  - (2) Prepares and makes available to the affected employees written records of the safety and health issues discussed at the committee meetings and maintained for review by the Division upon request. The committee meeting records shall be maintained for at least one (1) year;
  - (3) Reviews the results of the periodic, scheduled worksite inspections;
  - (4) Reviews the investigations of occupational accidents and causes of incidents resulting in occupational illness, or exposure to hazardous substances and, where appropriate, submits suggestions to management for the prevention of future incidents;
  - (5) Reviews investigations of alleged hazardous conditions brought to the attention of any committee member. When determined necessary by the committee, the committee may conduct its own inspection and investigation to assist in remedial solutions.

- (6) Submits recommendations to assist in the evaluation of employee safety suggestions; and
- (7) Upon request from the Division, verifies the abatement action taken by the employer to abate citations issued by the Division.

Note: Authority cited: Sections 142.3 and 6401.7, Labor Code. Reference: Sections 142.3 and 6401.7, Labor Code.

# Injury and Illness Prevention Program

The following written Injury and Illness Prevention Program, combined with the basic safety policies of the Solano County Office of Education (SCOE), document that it is SCOE's policy to fully comply with Labor Code Section 6401.7 and General Industry Order Section 3203, Injury and Illness Prevention Program.

### I. Solano County Office of Education Business Description

The Solano County Office of Education is a partner to Solano County's 6 school districts, providing services and oversight that help them to serve approximately 64,000 students. While SCOE does not have or create policies directing district behavior (each district sets its own policies), SCOE does offer key services and programs including:

- Service and support to help districts meet legal mandates, operate cost-effectively, and raise student achievement.
- Fiscal oversight of districts.
- Schools and services for special education and alternative education students who are not enrolled at district sites.
- College and career readiness and workforce development services to assist districts in preparing their students for the future.
- Professional development for teachers and administrators.

Solano County Office of Education
5100 Business Center Drive
(707) 399-4441

# II. Authority and Responsibility (8 CCR 3203 A.1)

The person(s) with the authority and responsibility for implementing the Solano County Office of Education's Injury and Illness Prevention Plan are listed below.

Manolo Garcia, Associate Superintendent of Human Resources and Educator Effectiveness, is responsible for implementing and enforcing the SCOE's Injury and Illness Prevention Program.

Mr. Garcia can require employee compliance with established work practices in accordance with the SCOE's Employee Handbook.

# III. Identification, Evaluation, and Prevention (8 CCR 3203 A.2)

The Solano County Office of Education will use the following system for identifying, evaluating, and preventing occupational safety and health hazards.

1. There shall be periodic and scheduled inspections of the facility and all workstations.

- a. Frequency of inspections shall be based on need, but all areas will be inspected at least yearly.
- 2. There shall be investigations of all occupational accidents, injuries, illnesses, and other potentially hazardous events.
- 3. There shall be a review of applicable General Industry Safety Orders and other Safety Orders that apply to SCOE's operations.
- 4. There shall be a review of industry and general safety information related to occupational safety and health hazards found in office environments.
- 5. There shall be evaluations made of other information or hazards reported by employees.

### IV. Communication (8 CCR 3203 A.3)

The following methods shall be used to effectively communicate with employees to meet the required standard.

- 1. The Solano County Office of Education has established a Labor/Management Safety and Health Committee which meets quarterly.
  - a. Minutes are prepared and provided by Nori Kelly.
  - b. Additional means of safety communication are as follows;
    - Contacting any member of the Labor/Management Safety and Health Committee
    - ii. Contacting any member of the Management Advisory Committee or your Supervisor.
    - iii. Completion and submission of the Employee Safety Reporting Form.
    - iv. Any safety-related information can be sent anonymously to the Labor/Management Safety and Health Committee, c/o Solano County Office of Education, 5100 Business Center Drive, Fairfield, CA 94534.

## V. Evaluation and Documentation of Hazards (8 CCR 3203 A.4)

Inspections to identify hazards shall be conducted when the program is first established; whenever new substances, processes, or equipment are introduced to the workplace that represent a new occupational

safety and health hazard; and whenever the Solano County Office of Education is made aware of a new or previously unrecognized hazard.

These hazards shall be evaluated, and if the exposure cannot be eliminated, it will be controlled using administrative methods or personal protective equipment and/or safe work practices.

### VI. Incident Investigation (8 CCR 3203 A.5)

Occupational incidents and injury/illness investigation will take place as follows:

- 1. Injury or illness is to be reported immediately to the supervisor, then to Company Nurse by calling 1 (877) 778-2526 at which time the employee will be given the option to seek medical treatment or report the injury with no referral for treatment.
- Upon report of injury, the Coordinator, Risk Management & COVID-19, will initiate an
  investigation of injury to be conducted as soon as possible. This includes occupational injury or
  illness, or hazardous occurrence.
- 3. The investigation will be documented in writing.
- 4. All records will be maintained by the Coordinator, Risk Management & COVID-19.

# VII. Methods & Procedures for Correcting Hazards (8 CCR 3203 A.6)

The following methods and/or procedures will be used to correct unsafe or unhealthy conditions, work practices and work procedures in a timely manner based on the severity of the hazard:

- 1. Imminent hazard: Personnel not needed for the corrective action will be removed from the area.
- 2. Less severe hazards: Problems will be dealt with in a timely manner by either the Coordinator, Risk Management & COVID-19 or the Manager, Facilities & Maintenance.
- 3. Activities such as training and/or retraining of employees on safe work practices and hazard problems will be practiced reducing unsafe or hazardous conditions.
- 4. Procedures such as a safety work order system, inspection review, and monitoring of employees and conditions will be standard operating procedures.

# VIII. Inspections

Inspections will be conducted to verify compliance with safe work practices and other safety requirements, to identify any new or additional hazards, and to monitor basic safety operations.

Inspections shall also be part of investigation procedures related to any occupational incident, injury, or illness occurrences.

Frequency and responsibility for inspections:

- Frequency of scheduled inspections: At minimum, annually.
- Parties Responsible:
  - o Coordinator, Risk Management & COVID-19
  - Manager, Facilities & Maintenance
  - Respective employee supervisors

### IX. Inspection Documentation

### **Documentation of Inspections:**

- 1. Periodic scheduled inspections are documented in writing and include methods of correction of hazards identified.
- 2. Documentation is maintained by the Coordinator, Risk Management & COVID-19 and where applicable the Director, Facilities, Maintenance, and Operations.

### X. Safe Work Practices

General and specific safe work practices including safe working conditions and protective equipment requirements are documented and communicated in the following manner: Written safe work practices/conditions are <u>distributed to all employees upon hire</u> and to all employees currently employed as of July 1, 1991.

Safe work practices have been developed for all Solano County Office of Education staff. The safe work practices are described in attached appendices. Employees shall receive training as required (see Section XI Employee Safety Training).

# XI. Employee Safety Training

Employee safety training shall be provided under the following guidelines:

- 1. Initial training shall be provided for all current employees and substitutes as soon after the establishment of the COE's program as possible.
- 2. New employees shall be provided with initial safety training upon hire and prior to assignment.
- 3. Employees shall be provided safety training when assigned to a new task or job for which training has not been received.
- 4. Supervisors shall be trained in hazards and safety practices in their area of responsibility.
- 5. Training shall include general and specific job safety category training.
- 6. Documentation of training shall be maintained in writing by individual and/or group training sessions. Documentation is maintained by the Coordinator, Risk Management & COVID-19.
- 7. Refresher training is provided at the following frequency: as needed but not less than annually. Specific designated training courses may be made available through our Target Solutions online training platform.

### XII. Documentation

Recordkeeping requirements of General Industry Safety Order 3203 shall be documented in writing and maintained for at least three years, except for specified job safety categories which have longer periods for certain activities under other code sections.

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On the date below, the Solano County Office of Education, Superintendent of Schools approved the written Injury and Illness Prevention Program.				
Superintendent of Schools  Solano County Office of Education	Date			