Chapter 1 - Written Injury and Illness Prevention Program

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1.1 Purpose
This manual sets forth policy, procedures and instructions for the County of Santa Clara Occupational Injury & Illness Prevention Program. In addition, it assigns authority, responsibility and requirements relative to these programs. A current copy of this program manual is available from ESA, Occupational Safety and Environmental Compliance (OSEC).

1.2 Applicability
This manual is applicable to all Santa Clara county employees, to all work conducted under the authority of the County, and to all equipment and property managed by the County. County contractors and other noncontractor personnel will follow the provisions of this handbook while at County facilities.

1.3 Authorities Incorporated by Reference
1. Title 8 California Code of Regulations, All Parts (Occupational Safety and Health Standards)
2. 29 CFR 1910, All Parts (Occupational Safety and Health Standards)
3. 10 CFR Chapter 1, All Parts (Nuclear Regulatory Commission)
4. 49 CFR 100-185 (Transportation of Hazardous Materials)
5. California Health and Safety Code, Sections 117600-118360 (Medical Waste Management Act)
7. California Building Code
8. California Mechanical Code
9. American National Standards Institute (those that apply to Safety and Health)
10. California Fire Code
11. National Fire Codes and Standards (NFPA)
12. All supporting documents to the above

1.4 Revision
The chapters listed in this manual are updated periodically and because of frequent changes in health and safety information and regulations promulgated by both the Occupational Safety and Health Administration (OSHA), State of California, or County of Santa Clara, this manual may not be up-to-date. For the most current safety and health information, please contact the Employee Services Agency at:

County of Santa Clara
Employee Services Agency
Occupational Safety and Environmental Compliance (OSEC)
1735 North First Street, Suite 295
San Jose, CA 95112
(408)441-4280
Fax (408)453-8126
1.5 Components of the Written Injury and Illness Prevention Program

1.5.1 Responsibility for administering program
The person responsible for implementing the Injury and Illness Prevention Program is the Manager of OSEC. Other program administration responsibilities are described in Chapter 2.

1.5.2 Systems For Ensuring That Employees Comply With Safe And Healthy Work Practices

- Employees injured on the job shall be afforded medical treatment (Chapter 3)
- Initial training is provided to employees.
- Two safety award programs are established for employees who make outstanding contributions to workplace safety. One is administered by the County Executive and one is sponsored by the County-wide Labor / Management Safety Committee. (Chapter 6)
- Additional training is provided by first-line supervisors and managers for employees who do not follow safe work practices. Supervisors maintain training records for their employees.
- Unsafe work practices are remedied through progressive counseling. (Chapter 7)

1.5.3 Systems for communicating with employees about safety and health matters

- Supervisors maintain on going communications with employees regarding safe work practices.
- Employees communicate with each other on issues of safety and health.
- Employees are encouraged to report safety or health hazards to management and can do so without fear of reprisal.
- Safety instructions are conveyed in English and employees are asked to repeat them back when language barriers exist or when it appears further clarification is required.
- The County-wide Labor/Management Safety Committee meets bimonthly and Department Labor/Management Safety Committees meet at least quarterly and contribute to the communication process by:
  - Preparing written minutes of each meeting and distributing copies to Committee members, OSEC and affected employees,
  - Reviewing investigation of hazardous conditions/practices identified on Hazard Reports (Chapter 11),
  - May conduct workplace inspections to augment those of the supervisor,
  - Assisting in the evaluation of employee safety suggestions, and
  - Reviewing results of worksite inspections.
• Safety and health information is distributed to all employees via the County Comline employee newsletter, published by the Office of the County Executive.

• The “Safety Alert”, a quarterly safety and health bulletin, is published by OSEC, and is distributed with employee paychecks.

• The Safety Guide booklet provides new employees general information to perform their jobs safely, and lists resources available to answer questions about safe work practices.

• CAL/OSHA Safety and Health Protection on the Job Posters are displayed on bulletin boards at all work locations.

• CAL/OSHA Log of Occupational Injuries and Illnesses are posted on bulletin boards in accordance with Title 8 regulations.

• Each department has at least one Safety Coordinator; there are over 50 Safety Coordinators County-wide. Safety Coordinators’ Forums are held bimonthly to update Departments on new safety regulations, provide training, and resolve safety issues.

1.5.4 Identification and evaluation of workplace hazards

1.5.4.1 Responsibility for inspections:
• Worksite safety inspections are conducted by supervisors or, where appropriate, by members of the Department Safety Committee using worksite-specific checklists or reports.
• Safety or health hazard exposures are evaluated and mitigated by supervisors.
• In addition to scheduled inspections, supervisors 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.
• Department Safety Professionals, Safety Coordinators, OSEC, Environmental Health, or outside consultants may assist in conducting unscheduled inspections or industrial hygiene monitoring.

1.5.4.2 Frequency of scheduled inspections.
• All worksites were inspected initially by the supervisor when this Injury and Illness Prevention Program was implemented.
• Thereafter, all work sites are inspected at least monthly.
• Supervisors of individual worksites identified on the Cal OSHA list of 100 High Hazard Industries are required to make at least bi-weekly inspections. County operations included in the list of High Hazard Industries are:
  - Roads Operations
  - Valley Medical Center
  - Sheriff’s Department
  - Department of Corrections

1.5.4.3 Recordkeeping
Recordkeeping for inspections includes:
• Inspection checklists / reports.
• Person conducting inspections.
• Unsafe condition found.
• Document corrective actions.
• Records must be retained in the Department for three years.
• Copies of completed inspection checklists or inspection reports are forwarded to:
  - Valley Medical Center, to VMC Protective Services.
  - Roads and Airports, to the Safety and Environmental Compliance unit
  - Parks and Recreation, to the Environmental Health & Safety unit
  - GSA, to the Environmental Compliance Specialist
  - All Others, to OSEC.

1.5.4.4 Hazard Reporting
• Employees identify hazards, complete Hazard Report form #4205 (Chapter 11), and submit it to their supervisor for action.

1.5.5 Procedures to investigate occupational injuries, illnesses, or exposures to hazardous substances
• The safety hazard reporting process can require progressive involvement of the supervisor, Departmental Safety Coordinator, Union Safety Steward, Departmental Safety Committee, OSEC or the Countywide Safety Committee until the problem is resolved. This process requires the investigation and elimination of the problem at the lowest possible level. The Hazard Report, Form #4205, is used to document any action taken. (Chapter 11)
• All injuries/illnesses are investigated by the injured employee's supervisor.
• The Supervisor's First Report of Industrial Injury/Illness form (#370) has an investigative section which asks:
  - “Why in your opinion did this accident/exposure occur?”
  - “What have you done to prevent a similar injury/illness?”
  - “Has preventive action been initiated, completed?”
• Injury/illness reports are distributed to the Department Safety Coordinator and OSEC for review and follow-up.
• The Department Safety Coordinator and OSEC are notified immediately and respond to the scene whenever serious or multiple injuries/illnesses occur.

1.5.6 Other investigative resources:
• OSEC and/or GSA Building Operations investigates hazards related to buildings and the physical plant.
• OSEC conducts investigations involving hazardous materials and hazardous waste.
• Valley Therapy Services and/or US HealthWorks, the County’s occupational medicine service-providers, may be requested to investigate ergonomic related injuries/illnesses.
• Agriculture Commissioner regulates pesticide use, and investigates injuries due to pesticide use.
• Outside consultants may be requested to investigate where the County does not have the resources internally.

1.5.7 Methods and procedures for correcting unsafe or unhealthy conditions and work practices.

• Unsafe or unhealthy work practices are corrected by supervisors through retraining and, if not successful, through progressive discipline.

• Supervisors ensure employees are provided, and properly use, appropriate personal protective equipment or clothing (Chapter 12).

• Supervisors remove unsafe tools or equipment from service.

• Whenever unsafe or unhealthy conditions involving County facilities are identified through inspections, Hazard Reports, or accident investigations, the following occurs:
  - The supervisor takes corrective action to eliminate or mitigate the problem.
  - A service call or work order is directed to GSA Building Operations and if the work involves a safety issue, it is so identified.
  - GSA Building Operations places barricades around dangerous areas until conditions are made safe.
  - Major construction projects are added to the County Capital Budget and are prioritized through the budget process.
  - Records of corrective action are maintained by the Facility Manager for a period of three years.

• When an emergency occurs:
  - Emergency action plan “Planning For and Responding to Emergencies in County Facilities” is communicated to all County personnel and is implemented during emergencies. (Chapter 4)
  - Facility Managers have authority to evacuate buildings.

• The Office of Occupational Safety and Environmental Compliance maintains a Safety Resources Library, including training videos for use by supervisors or safety personnel to assist them in determining appropriate hazard correction methods.

1.5.8 Specific Occupational Health and Safety Programs

• The County’s Personal Protective Equipment Program is described in Chapter 12.

• The County’s Hazard Communication Program is described in Chapter 13.

• Control of Bloodborne Pathogens is described in Chapter 14.

• Hearing Conservation is described in Chapter 15.

• Lockout/Tagout procedures are described in Chapter 16.

• Respiratory Protection is described in Chapter 17.

• Welding Safety is detailed in Chapter 18.

• The County’s Confined Space Program is described in Chapter 19.

• The County’s Ergonomics Program is contained in Chapter 20.

• Forklift and Industrial Vehicle Safety is described in Chapter 21.

• Workplace Violence Prevention is discussed in Chapter 22.
1.5.9 Occupational health and safety training program

- Emergency Response Teams have been formed throughout the county. Employees have been provided CPR and First Aid training. Team meetings also include training segments.

- Safety Coordinator Forum training includes Cal/OSHA refresher, ergonomics train-the-trainer, and other pertinent safety training topics.

- A Hazardous Materials program is provided for all supervisors whose employees work with hazardous materials. These trained supervisors then provide training to their employees. (Chapter 13)

- The County’s Safety Policy and Goals are discussed at New Employee Orientation training, and Safety Guide booklets are issued to all new employees.

- Back Care Training is provided upon request through a number of programs.
  - The Health Promotion Program provides back training as part of its Wellness Program.
  - Ergonomic training provided by US HealthWorks, which includes back care. This program is for all employees (except VMC employees).
  - Videos on back care can be borrowed from the OSEC video library.
  - Valley Medical Center has mandated back care training for both nursing and non-nursing staff.

- Employees subject to the Construction Safety Orders receive safety training at least once every ten days.

- There are three driver training programs provided for County employees. All employees who drive attend the four-hour defensive driver program. This program is taught by an outside instructor and uses curriculum from the National Safety council.
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- The Health Promotion Program provides wellness training including stress management.

- The Leadership Academy, a management skills training program for recently hired or promoted supervisors, includes a three-hour session on safety responsibilities.

- The County Wide Joint Labor/Management Safety Committee sponsors the Annual Safety Seminar, open to all County employees, contingent upon Supervisor approval.

- First-line supervisors and managers provide additional training for employees who do not follow safe work practices.

- All training is documented by supervisors at the worksite for each employee and retained for three years. A Safety Training Documentation Template is found in Appendix A. Documentation includes at a minimum:
  - Employee name or identifier
  - Training dates
  - Types of training
  - Training provider

1.6 Applicable Regulations

Title 8, California Code of Regulations, Section 3203 (See Appendix B)

1.7 Appendices
### 1.7.1 Appendix A: Safety Training Record

Safety Training Class: ____________________________________________________________

Presented By: ___________________________  Date: ___________________________

Venue: ________________________________  Time: ___________________________

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1.7.2 Appendix B: Injury and Illness Prevention Program

§3200. Purpose.

To fulfill the expressed social public policy of the State of California set forth in Article XX, Section 21 of the Constitution, to make full provision for securing safety in places of employment, these General Industry Safety Orders are promulgated for the guidance of employers and employees alike. Compliance with these orders may not in itself prevent occupational injuries or diseases, but will, it is believed, provide a safe environment which is a fundamental prerequisite in controlling injuries. Every employer should provide his supervisory staff with a copy of these orders and assure himself that each supervisor is familiar with those sections pertaining to the operations under his supervision.


§3201. Title.

These safety orders shall be known as General Industry Safety Orders.

§3202. Application.

(a) These orders establish minimum standards and apply to all employments and places of employment in California as defined by Labor Code Section 6303; provided, however, that when the Occupational Safety and Health Standards Board has adopted or adopts safety orders applying to certain industries, occupations or employments exclusively, in which like conditions and hazards exist, those orders shall take precedence wherever they are inconsistent with the General Industry Safety Orders hereinafter set forth.

NOTE: Unless otherwise designated in this subchapter, the phrase "division" refers to the current Division of Occupational Safety and Health or any of its predecessors including the former Division of Industrial Safety or the Division of Occupational Safety and Health Administration. Reference to the former Division of Industrial Safety or Division of Occupational Safety and Health Administration in these orders is meant to refer to their successor, the Division of Occupational Safety and Health, or any subsequent successor agency.

(b) After the date on which these Orders become effective, all installations shall conform to these Orders.

EXCEPTION: (1) Existing installations which are in compliance with safety orders, or variations therefrom, in effect prior to the effective date of these safety orders, unless the hazard presented by the installation or equipment is, in the judgment of the Chief of the Division, of such severity as to warrant control by the application of the applicable sections of these orders.

(2) Facsimiles, replicas, reproductions, or simulations when used for exhibition purposes when such compliance would be detrimental to their use for such purposes unless the hazard presented by the installation is, in the judgment of the Chief of the Division, of such severity as to warrant control by the application of the applicable sections of these Orders.

(c) Regulations herein affecting building standards, apply to any building, or building alteration, or building modification for which construction is commenced after the effective date of the regulations. Date of commencement of construction, for the purpose of this section, shall be:
1.7.2 Appendix B: Injury and Illness Prevention Program

(1) The advertising date for invitation of bids for State and local government projects.

(2) The building permit issuance date for other projects.

(Title 24, Part 2, Section 2-109.)

NOTE: Identification of Building Regulations. The basic building regulations for employments and places of employment contained in Title 24, State Buildings Standards Code, California Administrative Code are part of these safety orders. Pursuant to Health and Safety Code Section 18943(c), such building regulations are identified in these safety orders by the addition of a reference to the appropriate section of the State Building Standards Code (Title 24), which is added to the end of the safety order section:

(Title 24, Part X, Section XXXX.)

(d) Nothing contained in these regulations shall be considered as abrogating the provisions relating to public safety of any ordinance, rule or regulation of any governmental agency, providing such local ordinance, rule or regulation is not less stringent than these minimum standards.

NOTE: The filing date 12-19-49 shown in the History Note of Section 3200 is for the sections originally filed. The filing date of sections subsequently adopted or revised is shown in the History Note at the end of the section. Orders become effective 30 days after filing.

(Title 24, T8-3202)


§3203. Injury and Illness Prevention Program.

(a) Effective July 1, 1991, every employer shall establish, implement and maintain an effective Injury and Illness Prevention Program (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 worksite 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
1.7.2 Appendix B: Injury and Illness Prevention Program

instruct employees orally in general safe work practices with specific instructions with respect to hazards unique to the employees' job assignments as compliance with subsection (a)(3).

(4) Include procedures for identifying and evaluating work place hazards including scheduled periodic inspections to identify unsafe conditions and work 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 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 employees given new job assignments 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;

(E) Whenever the employer is made aware of a new or 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.

(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
1.7.2 Appendix B: Injury and Illness Prevention Program

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 the hazards unique to the employee's 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 Employers 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 Workers' 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 governmental entities (any county, city, city and county, or district, or any
public or quasi-public 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
1.7.2 Appendix B: Injury and Illness Prevention Program

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 results of the periodic, scheduled worksite inspections;

(4) Reviews investigations of occupational accidents and causes of incidents resulting in
occupational injury, 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 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.