



**Santa Clara  
University**

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# Injury and Illness Prevention Program (IIPP)

**Santa Clara University  
500 El Camino Real  
Santa Clara, CA 95053**

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# Injury and Illness Prevention Program

## 1. Purpose

Santa Clara University (SCU) has developed an Injury and Illness Prevention Program (IIPP) to comply with the California Occupational Safety and Health Administration's (Cal-OSHA's) General Industry Safety Order (GISO): CCR Title 8, Section 3203, "Injury and Illness Prevention Program". The regulation requires the development of a program to prevent illness and injuries in the workplace. The purpose of this program is to establish a procedure that will help ensure the health and safety of SCU employees. This program also provides a process for reporting injuries, illnesses and incidents if they occur and the necessary steps for preventing reoccurrences.

## 2. Applicability

The Injury and Illness Prevention Program described in this document is applicable to all Santa Clara University employees (staff, faculty and student employees).

## 3. Definitions

NOTE: The most pertinent definitions for all users are contained in Attachment 1. Review and use as necessary.

## 4. Overview

This written program is divided into the following sections:

- Program roles and responsibilities;
- Identification, correction, and prevention of safety and health hazards;
- Incident response and investigation;
- Communication and enforcement
- Education;
- Recordkeeping and documentation; and
- Program audit and review.

## 5. Program Roles and Responsibilities

This document constitutes SCU's Injury and Illness Prevention Program. The ultimate responsibility for SCU's Injury and Illness Prevention Program rests with the General Counsel of SCU. The program administrator responsible for implementing and maintaining this program is delegated to Sean Collins, Environment, Health and Safety Senior Director who can be reached at 500 El Camino Real, Santa Clara, CA 95053, (408) 554-5078, or via the Facilities Operations Hotline, 408-554-4742.

The following are the SCU Roles and Responsibilities in regards to the Injury and Illness Prevention Program:

Group	Responsibilities
<p><b>Environment, Health, and Safety (EHS) Senior Director</b></p> <p><i>The EHS Senior Director is the program administrator who is responsible for implementing and maintaining SCU's IIPP.</i></p>	<ul style="list-style-type: none"> <li>• Implement and maintain the Santa Clara University Injury and Illness Prevention Program.</li> <li>• Maintain active EHS communication throughout Santa Clara University.</li> <li>• Work with supervisors as well as faculty, staff and student employees to define and continuously improve the SCU EHS programs.</li> <li>• Conduct Risk and Hazard Assessments and Personal Protective Equipment (PPE) Assessments, as required under 8 CCR 3203 and 8 CCR 3380 et seq and described in the <b>SCU Hazard Assessment Program</b>. Ensure that corrective actions are completed.</li> <li>• Develop and distribute procedures for inspection, accident reporting, accident investigations, and emergency preparedness and response.</li> <li>• Ensure inspections are conducted across the campus with frequency based on risk (areas include academic laboratories, facility operations, offices, etc.) and work with responsible supervisors to complete appropriate corrective actions as needed. Review corrective action documentation.</li> <li>• Create and manage the distribution process to ensure that each department with new employee(s) documents the provision of the Injury and Illness Prevention Program training materials.</li> <li>• Provide regulatory notification when required for Cal-OSHA and environmentally-related incidents.</li> <li>• Review any incident investigations as reported on the SCU Incident Report form to ensure the root cause analysis is thorough and complete to prevent reoccurrence.</li> <li>• Perform an annual review for the effectiveness of the SCU Injury and Illness Prevention Program.</li> <li>• Participate in accident summary reviews with Risk Management, HR and SCU Loss Control Provider</li> <li>• Track environment, health and safety regulatory developments, and keep administration apprised of regulations and standards that impact Santa Clara University.</li> <li>• Provide guidance and solutions in resolving EHS related issues.</li> <li>• Manage emergency preparedness and response activities.</li> <li>• Identify and coordinate EHS training needs with supervisors.</li> <li>• Bring in additional resources (i.e. contractors, consultants, auditors, etc.) to assist in achieving SCU EHS goals and objectives.</li> </ul>
<p><b>Faculty, Staff,</b></p>	<ul style="list-style-type: none"> <li>• Follow safe work practices.</li> </ul>

<p><b>Student Employees</b></p> <p><i>Employees are responsible for the safety of their own actions and for monitoring the safety of operations around them.</i></p>	<ul style="list-style-type: none"> <li>• Promptly report any accidents, unsafe conditions, or unsafe acts, to their supervisor or other responsible party.</li> <li>• Be familiar with emergency and evacuation procedures.</li> <li>• Attend training as required.</li> <li>• Know the location of safety and emergency equipment such as eyewash, safety showers, and fire extinguishers and how to operate eyewashes and showers.</li> <li>• Maintain personal work area in accordance with specific safety requirements for their work areas and wear proper PPE when required.</li> <li>• Suggest solutions to improve the safety of processes, equipment, production materials, training or the building.</li> <li>• Serve as a good role model to co-workers for safe work practices.</li> <li>• Conduct inspections of work areas as required by this program as well as the Chemical Hygiene Program and complete any corrective actions as needed.</li> </ul>
<p><b>Supervisors</b></p> <p><i>Supervisors have the best understanding of hazards associated with the operations they oversee. For this reason, the Injury and Illness Prevention Program places certain responsibilities on supervisors.</i></p> <p><i>Supervisors and Faculty are responsible for ensuring their areas are safe and employees and students properly trained.</i></p>	<ul style="list-style-type: none"> <li>• Responsible for ensuring the safety of their employees, students, and/or faculty.</li> <li>• Ensure that employees who report to them, including student employees, are trained on the specific hazards associated with their respective work area.</li> <li>• Ensure that employees who report to them are aware of, and familiar with emergency procedures.</li> <li>• Monitor employees to ensure effectiveness of initial training and providing retraining as necessary</li> <li>• Ensure that safe work practices and procedures (including use of PPE) are followed and respond to employees' questions regarding the Injury and Illness Prevention Program and hazards in the workplace.</li> <li>• Reinforce training by monitoring the activities of their employees for unsafe acts and implementing corrective action as necessary.</li> <li>• Ensure their employees' work areas are safe. For office areas, use the Office Checklist and correct identified deficiencies. Notify EHS and/or Facilities for support in correcting related items. For laboratory areas, refer to the requirements outlined in the Chemical Hygiene Plan.</li> <li>• Report unsafe work conditions to EHS.</li> <li>• Ensure that area housekeeping practices are maintained.</li> <li>• Report and contribute to the investigation of all accidents/incidents/near misses following the procedures outlined in this program</li> <li>• Serve as a good role model to co-workers and subordinates for</li> </ul>

	<p>safe work practices.</p> <ul style="list-style-type: none"> <li>• Implement corrective actions for accidents, unsafe conditions or identified hazards in the department to prevent reoccurrence.</li> <li>• Participate, as needed, in the accident/incident investigation and corrective action determination.</li> <li>• Recognize employees for following health and safety requirements.</li> <li>• Discipline employees who do not comply with safe work practices, up to and including termination.</li> </ul>
<b>Building Maintenance Mechanics</b>	<ul style="list-style-type: none"> <li>• Conduct monthly building maintenance inspections and record findings on Building Maintenance Inspection Checklist. Generate Facility work orders for identified corrective actions.</li> </ul>
<b>Department of Human Resources (HR)</b>	<ul style="list-style-type: none"> <li>• Manage the Workers' Compensation process.</li> <li>• Maintain and retain employee records related to work related injuries or illness.</li> <li>• Provide Workers' Compensation information to new staff employees.</li> <li>• Facilitate Injury and Illness Prevention Program training for new staff through new employee orientation.</li> <li>• Support with EHS's data needs to prepare annual analysis of accidents/incidents.</li> </ul>
<b>Campus Safety</b>	<ul style="list-style-type: none"> <li>▪ As a first responder to emergencies, contacts the EHS Senior Director or EHS Staff as necessary.</li> <li>▪ Assists in collecting accident/incident information.</li> </ul>
<b>University Risk Manager</b>	<ul style="list-style-type: none"> <li>▪ Supports EHS's data needs to prepare annual analysis of accidents/incidents.</li> </ul>

## 6. Identification, Correction and Prevention of Safety and Health Hazards

SCU has in place a system to identify, correct and prevent safety hazards that involves periodic inspections, risk and hazard assessments, and an employee health and safety assessment process.

### **Hazard Identification**

***Inspections.*** Periodic inspections are conducted by SCU supervisors, employees, and the EHS department to identify and evaluate unsafe work conditions and work practices. These inspections are performed according to the following schedule:

**Monthly:** All buildings receive routine inspections by SCU Facilities Maintenance Mechanics as issued by the SCU work order management system (AiM).

**Quarterly:** Laboratories where there is laboratory use of hazardous materials (see Chemical Hygiene Plan) are inspected on a quarterly or annual basis depending on the risk level of the lab. Lab inspections are recorded in the online SCU lab inspection system (LabCliq).

**Annually:** Other laboratories, shops and studios should be inspected annually by the Laboratory, Shop or Studio Supervisor. The Laboratory and Shop Checklist (in Chemical Hygiene Plan) should be completed and retained by the designated Supervisor (Laboratory, Shop or Studio supervisors are designated by their Department Chair).

**Periodic:** Employees and Supervisors should periodically review their office areas for hazards. Any time an office is moved, reconfigured, or remodeled employees and supervisors are encouraged to use the Office Checklist to ensure that new hazards have not been created. The EHS Staff along with the Santa Clara Fire Department (SCFD) conduct annual inspections of all buildings on campus for life safety hazards.

*Areas found to be in non-compliance will have corrective actions tracked in either the SCU work order management system (AiM) or other tracking mechanism, (such as but not limited to, Lab Safety Audit system, Excel, LabCliq) to track and close audit findings.*

The designated Laboratory supervisor is responsible for conducting the inspections and ensuring that all necessary corrective actions are completed in a reasonable timeframe.

**Hazard Assessments.** Risk and hazard assessments and personal protective equipment (PPE) assessments involve a detailed, comprehensive review. An employee or supervisor may contact the EHS Staff to discuss the need for such an assessment at any time. The EHS Staff may also conduct a risk and hazard assessment when:

- New substances, processes, procedures or equipment that present potential new hazards are introduced into the work place;
- New, previously unidentified hazards are recognized;
- Occupational injuries/ illnesses, or incidents occur;
- Work place conditions warrant an assessment;
- Evaluation of information provided by employees indicates an assessment is needed.

The EHS Staff is responsible for conducting the Hazard Assessments and verifying that necessary corrective actions are completed in a reasonable timeframe. Details of the process may be found in the **SCU Hazard Assessment Program** and/or laboratory safety programs.



***Health and Safety Assessments.*** If an employee has a health concern regarding his/her workplace, the employee should contact the EHS Senior Director or EHS Staff for a health and safety assessment of the workplace. The EHS Senior Director or assigned EHS Staff will conduct the assessment as soon as possible and a report will be provided to the employee in a timely manner after completion of the assessment. If an immediate health and safety concern is identified, the EHS Director will notify the employee and the employee's supervisor so that immediate action can be taken to remedy the situation. The employee does not need to provide any medical information to EHS. If the concern regards radioactive material or equipment the employee should contact the Radiation Safety Officer.

*If, at any time, an employee is experiencing any health issues possibly related to the workplace, the employee should contact Human Resources immediately. In case of emergency, the employee should seek emergency assistance (911 or x4444.)*

### **Hazard Correction**

Hazards including unsafe or unhealthy work conditions, practices or procedures at SCU work locations identified as a result of inspections and assessments, or at any time, are corrected in a timely manner based on the severity of the hazards, and according to the following:

- When the condition, practice or procedure is observed or discovered;
- When the hazard is one that is easily abated, it should be corrected immediately.
- When an imminent hazard exists that cannot be immediately abated without endangering employee(s) and/or property, SCU will remove all exposed employees and others from the area except those necessary to correct the existing condition. Only those employees wearing protective equipment and trained to correct the hazard will be admitted to the affected area or participate in the correction.

Hazards including unsafe or unhealthy work conditions, practices or procedures at SCU work locations identified as a result of inspections and assessments must have associated corrective actions. The associated corrective action should provide control mechanisms such as new or revised practices or procedures, engineering controls such as improved ventilation and/or personal protective equipment that abate the hazard or bring it within an acceptable level of risk. The responsible supervisor takes the lead in ensuring the hazard is abated with the input the EHS Senior Director or assigned EHS Staff as needed. Hazard abatement will be documented and available for review by the EHS Staff.

### **Preventing Hazards**

A key to preventing future incidents is to understand what happened each time an accident or incident occurs. Procedures for investigating workplace accidents and hazardous substance exposures are described in the next section.

## 7. Incident Report and Review

Incident reports and reviews are intended to determine causative or contributing factors of occupational injuries and illnesses and for use in determining if any action is necessary to prevent recurrence. ***Incidents include near misses, injuries, illnesses, exposures, or hazardous material spills.*** Employees are to report workplace incidents to their supervisor as soon as possible using the forms found on the SCU EHS website at [www.scu.edu/ehs/incident-reporting](http://www.scu.edu/ehs/incident-reporting). Alternatively, Campus Safety may issue a written report which can serve as the incident report.

### ***Injury Report and Review Process***

When there is an injury, illness or exposure, the employee or their supervisor must also contact the Department of Human Resources within 24 hours of the incident or as soon as practically possible. The supervisor must refer the employee to the Department of Human Resources if the employee has not already contacted the Department of Human Resources. If the employee is not able to contact the Department of Human Resources, the supervisor must notify the Department of Human Resources of the work-related injury, illness, or exposure within 24 hours of learning of the incident. The Department of Human Resources will provide the Initial Report of Injury and Incident Report Forms.

The supervisor must work with the involved employee to complete the employee section of the Incident Report Form located on the SCU EHS website as soon as possible. After completing the employee section of the Incident Report Form, the employee must then give the form to the supervisor to complete the supervisor's section. If the employee is not able to complete the employee section, then the supervisor must complete only the supervisor's section. As part of completing the report form, supervisors must contribute to the incident investigation and follow-up with corrective measures. The supervisor must return the completed Incident Report Form to EHS Senior Director or assigned EHS Staff as soon as possible.

### ***Injury Reporting Steps:***

- Life threatening injuries shall be reported immediately either to Campus Safety or by calling 911 to obtain medical assistance for the injured person.
- Non-life-threatening injuries shall be reported to the person's supervisor and to Human Resources for clinic authorization.
- Human Resources will authorize the employee to obtain treatment and initiate the incident investigation form.
- For non-injuries or near misses the employee shall file an incident report with their supervisor.

A flow chart for the Injury Incident Report and Review process is located on the SCU EHS website:

[www.scu.edu/ehs/incident-reporting](http://www.scu.edu/ehs/incident-reporting)

For work related injuries or illness, the SCU contracted care facilities are:

<b>During regular work hours for Occupational Injuries and Illnesses</b>	<b>After Hours medical center and major injury or illness</b>
Concentra Medical Center Occupational Medicine Clinic 1887 Monterey Road, Suite 200 (408) 288-3800	O'Connor Hospital 2105 Forest Ave. San Jose, CA 95128 (408) 947-2500

***In the event of a serious or life- threatening illness, emergency 9-1-1 should be called immediately.***

**Incidents with Serious Injuries, Serious Illnesses, or Fatalities**

Supervisors and/or Campus Safety shall contact EHS as soon as possible to report work related death, serious injury, or illness. EHS immediately (within 8 hours) reports any serious injury, illness, or fatality to Cal/OSHA as required by 8 CCR 342. <https://www.dir.ca.gov/dosh/Serious-injury-FAQ.html>

Cal/OSHA defines an injury or illness as “serious”: *Serious injury or illness” means any injury or illness occurring in a place of employment or in connection with any employment that requires inpatient hospitalization for other than medical observation or diagnostic testing, or in which an employee suffers an amputation, the loss of an eye, or any serious degree of permanent disfigurement, but does not include any injury or illness or death caused by an accident on a public street or highway, unless the accident occurred in a construction zone.*

**Incidents without Injuries**

Incidents without injuries may include fires, hazardous material/waste spills, unplanned emissions, chemical exposures, near misses and accidents without injuries. The Incident Report and Review process is similar to the Injury Report and Review process. The supervisor must work with the key involved employee or employee witness to complete the employee section of Incident Report Form as soon as possible. After completing the employee section, the employee gives the form to the supervisor to complete the supervisor’s section. If there is no witness or key involved employee then the supervisor must complete only the supervisor’s section. As part of completing the report form, supervisors must contribute to the incident investigation and follow-up with corrective measures. The supervisor must return the completed Incident Report Form to EHS Senior Director or assigned EHS Staff as soon as possible. A simplified flow chart for the Non-Injury Incident Report and Review process, click [here](#)

## **Incident Review Procedures**

All serious injuries, illnesses or fatalities (described on previous page) and overexposures to chemical, biological, radiation, and physical stressors are reviewed immediately by EHS. Supervisors contribute to the incident review by completing the Incident Report Form and working with the EHS Staff as needed. EHS reviews the submitted incident report form and follows up as needed to help ensure adequate corrective actions have been identified and implemented.

Procedures for investigating workplace accidents and hazardous substance exposures may include:

- Visiting the accident scene as soon as possible;
- Interviewing injured workers and witnesses;
- Examining the workplace for factors associated with the accident/exposure;
- Determining the root cause of the accident/exposure;
- Reviewing training records of the personnel involved;
- Requesting Video Camera footage of the location – contact CSS;
- Taking corrective action to prevent the accident/exposure from reoccurring; and
- Recording the findings and corrective actions taken.

## **8. Communication and Enforcement**

The SCU Injury and Illness Prevention Program is designed to allow and encourage employees to communicate with various levels of management on safety issues and also to provide the necessary mechanism to keep employees informed regarding matters important to their health and safety. **There will be no reprisals or other job discrimination for expressing any concern, comment, suggestion or complaint about a health and safety related matter.**

**Communication.** The Injury and Illness Prevention Program elements are communicated and discussed to facilitate a flow of safety and health information between administration, supervisors and employees by:

- Training at new employee orientation;
- Maintaining discussions between supervisors and employees regarding job specific policies;
- Monitoring by supervisors to ensure effectiveness of initial training and providing retraining as necessary;
- EHS workplace-specific training for activities such as Hot Work, Confined Spaces, Chemical Management, etc.;
- Communicating safety information through a variety of means such as: postings in the workplace, email messages, postings on the SCU website and distributing materials to employees;
- Providing SCU employees the means to anonymously inform the SCU administration about workplace hazards without fear of reprisal through the [Ethicspoint](#) system, hotline service; and

**Enforcement.** The University will apply appropriate and reasonable measures when employees do not adhere to the University's health and safety programs using a progressive disciplinary process as follows:

- Verbal Warning
- Written Warning
- Suspension
- Termination

Repeated failure to comply or willful and intentional noncompliance may result in disciplinary measures up to and including termination.

## **9. Employee Education**

SCU provides employees training regarding safe work practices and prevention of injuries and illnesses. All employees are trained on general and job-specific safety and health practices.

This education will include (but is not limited to):

- Explanation of SCU's Injury and Illness Prevention Program.
- Explanation of SCU's emergency procedures and fire prevention practices.
- Measures for reporting any unsafe conditions, work practices, injuries and when additional instruction is needed.
- Provisions for medical services and first aid, including emergency procedures.
- Proper housekeeping, such as keeping stairways and aisles clear, work areas neat and orderly, and promptly cleaning up of non-hazardous material spills.
- Prohibiting horseplay, scuffling, or other acts that adversely influence safety.
- Proper storage to prevent:
  - Stacking materials in an unstable manner.
  - Storing materials against doors, exits, fire extinguishing equipment or electrical panels.
- Prevention of repetitive motion disorders, including work station set up and proper lifting techniques.
- Proper reporting of hazards and incidents to supervisors or the EHS Staff.
- Hazard communication, including worker awareness of potential chemical hazards and proper labeling of containers.

Where applicable, training may also include:

- 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.
- Heat Illness Prevention.
- Information regarding Workers' Compensation at the time of hire.

Job specific training and instruction are provided as follows:

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

In addition, supervisors provide specific instructions to all employees regarding hazards unique to their job assignment, to the extent that such information is not already covered in other training.

## 10. Recordkeeping and Documentation

Completed records will be maintained as follows:

<b>Record</b>	<b>Location</b>	<b>Duration</b>
Inspection Records and Corrective Actions	Laboratory, Shop or Studio Supervisors for Laboratories, Shops, and Studios  AiM and LabCliq systems.	1 year
Incident Review Reports	EHS Files	5 years after termination of employment
Report of environmental impact from spill, explosion or fire	EHS Files	Indefinitely
Injury and Illness Prevention Program Training Records	EHS Files, Camino Record Database	1 Year after termination of employment
The written Injury and Illness Prevention Program	EHS files	Indefinitely
OSHA 300 Log	Department of Human Resources	5 years

Hazard and Risk Assessments and PPE Assessments	EHS Files	5 years
Employee Exposure records (subject to 8 CCR 3204)	EHS files	30 years

## 11. Program Audit and Review

SCU's Senior EHS Director or assigned EHS Staff, will conduct a periodic review of the Injury and Illness Prevention Program to ensure that the program reflects current University policies and practices, complements management responsibilities and incorporates any process or facilitates changes that have occurred.

## 12. Key References and Resources

- Cal/OSHA Title 8 California Code of Regulations (CCR) 3203, 3204, 3380
- Cal/OSHA Reporting: <http://www.dir.ca.gov/dosh/EnforcementPage.htm>
- Cal/OSHA Form 300 <https://www.osha.gov/recordkeeping/forms>
- SCU Chemical Hygiene Plan
- SCU Hazard Assessment Program
- SCU Fire Prevention Program
- SCU Laboratory Safety Program

# **Attachment 1**

## **Definitions**

**Accident** –a broad term covering a wide variety of events including, but not limited to, personal injuries and occupational illness (i.e., chemical exposures, cumulative trauma, etc.).

**Incident** –a broad term covering a wide variety of events including but not limited to, fires, chemical spills and releases, unusual odors, etc.

**Near-Miss Incident** - any accident or incident which might have caused a death, illness, injury or property damage but did not.

**Root Cause Analysis**- the most basic cause(s) that, if corrected, will establish control of risks to prevent future incidents, accidents, or “near-miss” incidents.

**Serious injury or illness**\*- (h) “Serious injury or illness” means any injury or illness occurring in a place of employment or in connection with any employment that requires inpatient hospitalization for other than medical observation or diagnostic testing, or in which an employee suffers an amputation, the loss of an eye, or any serious degree of permanent disfigurement, but does not include any injury or illness or death caused by an accident on a public street or highway, unless the accident occurred in a construction zone.

**Work-Related** - an injury, illness, property damage or other unsafe condition that occurs during and in the course of conducting business as a SCU employee.  
<https://www.osha.gov/laws-regs/regulations/standardnumber/1904/1904.5>

Questions: If you have any questions about the content of this IIPP, please contact the EHS Dept. Senior Director Sean Collins (408) 554-5078, or the Facilities Operations Hotline, 408-554-4742.