

***San Diego State University Research
Foundation
Injury & Illness Prevention Program***

***A Program for Compliance with the
General Industry Safety Orders of the
California Code of Regulations***

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San Diego State University Research Foundation

Injury and Illness Prevention Program

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San Diego State University Research Foundation

Injury and Illness Prevention Program

A. OVERVIEW

The San Diego State University Research Foundation is firmly committed to maintaining a safe and healthful working environment for employees, project participants, visitors and all others while they are on the premises or engaged in SDSURF business. To that end, the SDSURF has designed this Injury and Illness Prevention Program. The intent of the program is to prevent workplace accidents, injuries and illnesses. A complete copy of the program is maintained in the SDSURF Legal Affairs & Human Resources and is available for your review.

The State of California statute requiring employers to prepare and implement an "Injury and Illness Prevention Program" is California Code of Regulations, Title VIII, Section 3203. This law is enforced by the California Division of Occupational Safety and Health's Department of Industrial Relations (Cal/OSHA).

Among the specific elements required for the program are:

1. Communicating with employees on matters concerning safety and health;
2. Identifying and evaluating workplace hazards;
3. Implementing procedures for injury/illness investigation;
4. Mitigating hazards in the workplace;
5. Training employees;
6. Maintaining pertinent records and;
7. Designating a person responsible for the program.

The SDSUR Foundation's Injury and Illness Prevention Program was prepared by SDSURF Risk Management, Legal Affairs and Human Resources Departments in collaboration with the Department of Facilities Management and the San Diego State University Department of Environmental Health and Safety. The program has been designed to specifically address the statutory requirements outlined above, and to function as an "umbrella program" which incorporates the elements of other occupational hazard control programs and procedures. This program can be readily modified to integrate new or revised health and safety programs, including procedures required by new, pending or future legislation. SDSURF Legal Affairs and Risk Management revised the SDSURF IIPP Program in August of 2007.

B. OBJECTIVE

To promote the good health of SDSUR Foundation employees, program participants and visitors, the SDSURF has adopted a program dedicated to safety education and the elimination of unsafe conditions or practices. The SDSUR Foundation has implemented an Injury and Illness Prevention Program (hereafter referred to as IIPP) designed to provide an effective means for worker health protection and injury prevention. The IIPP is intended to assist all SDSURF employees in identifying and characterizing hazards that may exist in the workplace, correcting those hazards that have been identified and taking the necessary remedial actions to prevent them from recurring.

The objectives realized through proper implementation of the IIPP can result in many positive benefits, including the following:

- Hazards are prevented from occurring through regular identification and evaluation procedures.
- A means of communication is established for the SDSUR Foundation with employees and project participants on matters concerning safety and health.
- Employees are trained and educated on health and safety matters.
- Employees will know through proper training to report potentially hazardous conditions without fear of reprisal and that their reports will be given prompt and serious attention.
- Workplace equipment is maintained in safe and good working condition.
- Procedures are established to investigate workplace accidents, near-miss incidents and reported injuries and illnesses.
- Hazardous conditions are corrected in a timely and effective manner.
- Employees receive written general safety and health rules which apply to everyone.
- Safe and healthful work practices for each specific job performed are developed and received by employees through training.
- Disciplinary procedures have been established to assist in ensuring that safety rules and work procedures are practiced and enforced.
- The SDSUR Foundation has established a written response plan in case of emergency (Re: Sec. G) and for those areas not covered will comply with the SDSU disaster plan.
- A strategy is implemented through which compliance with the regulation can be achieved and documented.

C. POLICY

The intent of the San Diego State University Research Foundation in formulating the Injury and Illness Prevention Program is to promote a high level of technical and personal safety as required to protect employees, project participants, visitors and all others while they are on the premises or engaged in the conduct of SDSUR Foundation business. The SDSURF will maintain a working environment for employees that will not adversely affect their health and safety and will reduce their risk of avoidable illness or injury. All SDSUR Foundation employees are responsible for knowing and observing safety rules, using all required personal protective equipment, and reducing and/or eliminating hazards within their control. Employees are responsible for reporting any unsafe conditions or hazard knowing that the report can be made without fear of reprisal. Employees who fail to abide by health and safety rules or policies will be subject to appropriate disciplinary action. No employee will be required to perform any task that is determined to be unsafe or unreasonably hazardous. The SDSUR Foundation will comply with applicable municipal, county, state, federal, and other laws, standards, guidelines, ordinances and other regulatory requirements.

D. SCOPE

In consensus with the SDSUR Foundation's policy of maintaining a safe and healthful working environment, policies and programs are in place, which do not distinguish between employees and non-employees. Along these lines, the SDSUR Foundation encourages an atmosphere of safety and health consciousness that does not discern between employees and non-employees. However, the IIPP has been formally instituted in response to specific requirements prescribed by Cal/OSHA for *employee* injury and illness prevention. Therefore, the IIPP applies only to those employed by San Diego State University Research Foundation.

Many employees of the SDSUR Foundation are supervised by employees of San Diego State University and/or utilize the facilities of SDSU. Certain aspects of the SDSU Injury and Illness Prevention Program, including training, procedural compliance and general facility safety, may cover SDSUR Foundation employees. Individual coverage regarding incident investigation, reporting, etc. will be determined on a case-by-case basis by the SDSUR Foundation and SDSU.

E. RESPONSIBILITIES

The overall responsibility for the management of this program rests with the Director of Legal Affairs & Risk Management and Human Resources; however, each employee plays an important role in injury and illness prevention. The immediate responsibility for workplace health and safety belongs to each employee and those who serve in a supervisory capacity over a given area. Individual employees are responsible for maintaining an awareness of general safety procedures, using all personal protective or other safety equipment (e.g., gloves, safety glasses, machine guards, etc.), being knowledgeable of hazards, and

maintaining active vigilance in observing and reporting conditions which may be hazardous to themselves or their co-workers.

Accordingly, all managers and supervisors are charged with ensuring that safe and healthful conditions and practices are provided and followed within the areas under their control, and to comply fully with all applicable aspects of the IIPP.

Specific responsibilities under the IIPP are outlined as follows:

1. The SDSURF Risk Manager is primarily responsible for the overall administration of the program and compliance with applicable municipal, county, state, federal, and other laws, standards, ordinances and other regulatory requirements. Other responsibilities of the Risk Manager relative to the IIPP include:
 - a. Advising the Management Practices Group on issues relating to environmental health and safety.
 - b. Maintaining continuity and control and monitoring the effectiveness of the SDSUR Foundation's Injury and Illness Prevention Program.
 - c. Establishing and maintaining effective health and safety policies and procedures specific to SDSUR Foundation facilities and operations.
 - d. Acting as the SDSUR Foundations liaison with the SDSU Department of Environmental Health and Safety in response to health and safety issues.
 - e. Acting as the SDSUR Foundation's liaison with Federal OSHA and Cal/OSHA together with SDSU Department of Environmental Health and Safety, as appropriate.
 - f. Presiding over the SDSUR Foundation Safety Committee.
 - g. As required, with members of the Safety Committee, verifying abatement action taken by the SDSUR Foundation to abate citations issued by Cal/OSHA.
2. The Risk Manager is responsible for establishing and maintaining effective policies regarding employee health and safety issues. General policies, which govern the activities and responsibilities of employee health and safety programs, including the IIPP, are established under the final authority of the Director of Legal Affairs-Risk Management and Human Resources. Additionally, the Director of Legal Affairs & Risk Management-Human Resources or designee within the Department of Legal Affairs & Human Resources is responsible for:
 - a. Maintaining an injury and illness log as required by Cal/OSHA.

- b. Ensuring that applicable employee safety and health information is communicated to SDSUR Foundation managers and employees, as appropriate.
 - c. Promoting the promulgation and use of SDSUR Foundation safety rules specific to the needs of each department, agency or project.
 - d. Promoting and assuring safety training activities, including orientation of new employees and continuing education for all employees.
 - e. Reporting serious illnesses and injuries to the SDSUR Foundation's workers' compensation carrier, to the SDSU Department of Environmental Health and Safety and to Cal/OSHA, as necessary.
3. Project Directors are responsible for ensuring that injury and illness prevention is effectively practiced at projects under their purview. This includes:
- a. Providing, to the extent feasible, facilities and equipment, which fully comply with applicable federal, state and local safety laws and regulations, and are suitable for the activities conducted.
 - b. Preparing appropriate programs, protocols and procedures, which upon implementation, ensure effective compliance with the IIPP (e.g. inspection programs, task and process specific training, etc.)
 - c. Developing and implementing an education and training program designed to instruct employees in both general safe work practices and those instructions specific to their job duties.
 - d. Instructing employees in the recognition and avoidance of unsafe conditions, including hazards associated with non-routine tasks and emergency operations.
 - e. In conjunction with SDSURF Risk Management, maintaining records, which adequately document all health and safety-related educational and training activities.
 - f. Informing the SDSURF Risk Manager whenever new substances, processes, procedures or equipment might present a new hazard.
4. The SDSUR Foundation Safety Committee is charged with working to assist the Risk Manager, department, project, and agency directors in their efforts to maintain a safe and healthful working environment. The committee also acts as a liaison between employees and the management at the SDSUR Foundation, thus establishing a direct means of communication between employees and management. Other responsibilities include:

- a. Meeting on a quarterly basis (minimum).
 - b. Preparing and making available to employees written records of the safety and health issues discussed at the committee meetings, and maintaining such records for review by the pertinent authority.
 - c. Reviewing results of the periodic scheduled worksite inspections.
 - d. Reviewing investigations of occupational accidents, near misses 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.
 - e. Reviewing investigations of potentially hazardous conditions brought to the attention of any committee member. If determined necessary by the committee, the committee may conduct its own inspection and investigation to assist in remedial solutions thus identified.
 - f. Submitting recommendations to assist in the evaluation of employee safety suggestions.
 - g. As required, by the CEO and Director of Legal Affairs & Human Resources, verifying abatement action taken by the Foundation to abate citations issued by Cal/OSHA.
5. Individual employees should be aware of the real and potential hazards that may currently exist or arise in the future within the work environment, and use common sense, good judgment, and prudent practices at all times. Specific responsibilities of employees include:
- a. Reading and complying with procedures and guidelines provided by their supervisors.
 - b. Knowing and adhering to codes of safe practice for the general work area and the specific job assignment.
 - c. Informing their supervisors and/or SDSURF Risk Management of workplace hazards without fear of reprisal.
 - d. Attending established education and training sessions as necessary.
 - e. Use all personal protective equipment that is provided or necessary to protect worker health and safety.

F. HAZARD ASSESSMENT AND CONTROL

1. Identification of Workplace Hazards

Hazard assessment and control includes provisions for routine periodically scheduled inspections, unscheduled inspections, inspection of new matters and employee reporting of hazards. The inspection program is essential to reduce unsafe conditions which may expose employees to incidents that could result in personal injury, illness or damage to property.

a. Scheduled Workplace Inspections

- (1) Members of the Safety Committee will conduct scheduled safety surveys and safety inspections to identify unsafe conditions and work practices. These inspections will be completed on a quarterly basis. The SDSUR Foundation's Risk Manager, Coordinator for Space/Property Manager and the Coordinator for Work Control will inspect all areas where SDSUR Foundation employees work. These inspections are in addition to the inspections that individual departments, agencies and projects should also be conducting.
- (2) Each department, agency or project is encouraged to institute a system whereby regularly scheduled workplace safety surveys are conducted. Supervisors knowledgeable of the specific activities or materials present in the area to be surveyed should conduct these surveys.
- (3) The frequency of workplace surveys is dependent upon the department, agency or project's potential for hazard. It is recommended that office areas be inspected at least once every year. Those departments, agencies or projects engaged in hazardous operations (i.e. laboratory activities) are encouraged to conduct more frequent surveys.
- (4) Surveys and inspections should be performed using the SAFETY AND HEALTH INSPECTION REPORT. Upon completion of the form, send to SDSURF Risk Management where the documentation will be maintained.

b. Unscheduled Workplace Inspections

- (1) Members of the Safety Committee will conduct periodic unscheduled inspections of all workplaces to help ensure the maintenance of a safe and healthful workplace.

- (2) In conjunction with departmental, agency or project representatives, Risk Management and members of the Safety Committee, will conduct a health and safety inspection in the event of an occupational injury, occupational illness or exposure to hazardous substances as defined by Cal/OSHA.

c. Inspection of New Matters

- (1) The Risk Manager, departments, agencies, projects, and/or members of the Safety Committee will conduct an inspection upon learning that new substances, processes, procedures or equipment, which represent a new occupational safety health hazard, are introduced.
- (2) The Risk Manager, departments, agencies or projects, and/or members of the Safety Committee will conduct an inspection whenever notification of a new or previously unrecognized hazard is received.

d. Employee Reporting of Hazards

- (1) Employees are responsible for promptly reporting any unsafe condition or hazard that they discover in the workplace to their supervisor and/or the SDSURF Risk Manager. **Employees may report any suspected hazard without fear of reprisal. Employees will not be disciplined, discharged or suffer any adverse personnel actions for reporting these conditions.**
- (2) The employee's report should include the location of the condition believed to be unsafe or hazardous, the date and time the condition or hazard was observed, and a description of the unsafe condition or hazard. Employees are encouraged to include any recommendations they may have for correcting the reported unsafe condition or hazard.
- (3) The Risk Manager will respond to the reports by investigating the unsafe condition or hazard in a timely manner. The results of the investigation and action taken to correct the hazard or unsafe condition will be documented. Alternatively, information will be provided as to why the condition was not found to be unsafe or hazardous.
- (4) Employees may also report any unsafe condition or hazard anonymously by submitting the appropriate information to the SDSURF Risk Manager or to the SDSURF Director of Legal Affairs & Human Resources.

- (5) All documentation regarding employee reports and responses to the Risk Manager will be maintained in Risk Management. Employees upon request may review this documentation.

2. Monitoring and Correcting Safety and Health Concerns

Hazards identified during scheduled or unscheduled inspections, or as a result of accident investigations or employee reports, will be corrected in a timely manner. The following procedure shall be applied to eliminate or correct hazardous conditions in the workplace.

- a. Inspection findings will be prepared in writing and submitted to the Director of Legal Affairs & Human Resources. Corrective action, or a suitable timetable for elimination of a hazard (as appropriate) is the responsibility of the Risk Manager. The Facilities Management Department will provide appropriate assistance in the form of abatement or identification of possible corrective actions.
- b. Once identified, hazards will be ranked according to both consequence (i.e., severity) and probability (i.e. likelihood) as defined in Table 1. Prioritization of corrective actions will be based on this ranking scheme, as described hereinafter.

(1) Imminent Hazard Situations

An imminent hazard is defined as any condition or practice in which there is reasonable certainty that death or serious physical harm will occur unless the hazard is immediately eliminated or corrected. (For example, an employee working on high voltage equipment for which the power has not been shut off would be considered an imminent hazard.) Upon discovery of an imminent hazard during a safety inspection, the individual(s) conducting the inspection shall use appropriate means to immediately correct the situation. This may involve:

- Contacting the supervisor in question
- Taking a piece of equipment out of service or shutting down a procedure until a review can be performed
- Posting the area with a conspicuous notice or "yellow tag," etc.

Immediate corrective actions should be performed with the full knowledge of area employees, supervisors and managers, The

Risk Manager, department, agency, or project directors, and the Director of Legal Affairs & Human Resources, as appropriate, shall be notified. The Risk Manager shall be notified immediately of any condition identified, which presents an imminent hazard to health or safety. The involved department, agency or project director shall inform all employees of any such imminent hazard(s) that cannot be immediately corrected, and ensure that all necessary precautions are taken to minimize risk.

Personnel who continue to use an item that has been conspicuously tagged, or who willfully remove a tag before the unsafe condition is corrected, are subject to severe disciplinary action. Entry or use for the sole purpose of eliminating the hazardous condition may be allowed only with the knowledge and approval of the Risk Manager, Director of Legal Affairs & Human Resources or Director of Facilities Management.

(2) Less Serious Hazards

Hazards, which have a reasonable probability of producing injuries or illnesses, but are not deemed imminent dangers, should be corrected immediately upon detection, or as soon as possible thereafter. Upon discovery of a hazard characterized, as less serious hazard, the individual(s) conducting the inspection should take appropriate action to either correct the situation immediately, or notify the supervisor in question. SDSURF Risk Management, the department, agency, project director or Facilities Management, as appropriate, shall be notified if assistance is required to correct the hazard.

(3) Minor Hazards

A minor hazard is any condition or practice in which there is a remote probability that a minor injury or illness will occur. These hazards also have the probability of causing near misses, such that if not corrected could cause injury or illness. The person conducting the inspection should correct upon discovery or minor hazards as soon as possible. The department, agency or project, SDSURF Risk Management and/or director of the Facilities Management Department shall be notified if assistance is required to correct the hazard.

Table I
Hazard Priority Classification

Order of Priority	Consequence (Severity)	Probability of Injury Occurrence
1	Imminent danger exists. Capable of causing death, possibly multiple deaths, widespread occupational illness and loss of facilities.	Probable
2	Severe injury, serious illness property and equipment damage	Reasonably probable
3	Minor injury, illness or equipment damage may result	Remote
4	First aid care	Extremely Remote

G. EMERGENCIES

The SDSUR Foundation's injury and illness prevention strategy contains other programs, which serve a similar purpose to that of the IIPP. Among these programs is the Data Processing Disaster Recovery Plan, which is a comprehensive, stand-alone document. Disaster and emergency response programs and their associated procedures are outlined in the sections of that document. Section VII, Emergency Procedures, outlines the actions to be taken in response to emergency situations. The goal is that through training, preplanning and an effective initial response, the impact of an emergency or disaster situation can be greatly minimized.

H. COMMUNICATION WITH EMPLOYEES

The IIPP ensures that employees have the right to be advised of known occupational safety and health hazards and receive training in safe work practices, including the use of personal protective equipment.

Several methods of communication with employees on matters relating to health and safety have been established, and are described in this section.

1. Hazard Awareness and Safety Training

This program provides for various employee-training programs for general hazard awareness safety, as well as safety aspects related to specific activities. Job-specific training programs for employees will also be provided either on a periodic basis or prior to assignment on a new job or when work assignments change. These training programs are outlined in more detail in section K.

2. Staff Meetings

Supervisors will incorporate into their regularly scheduled staff meetings a discussion that will enable employees of the department, agency or project to freely and openly discuss safety and health issues. Management will attempt to schedule the meetings at a time when most employees can attend and will keep minutes to document who was in attendance and what topics were discussed.

3. Posters and Notices

SDSURF Risk Management and Facilities Management shall provide posters and notices to be used in promoting a safe and healthful workplace and work practices. Posters and notices shall be displayed in high visibility areas within each applicable workplace.

4. Safety Committee

The SDSUR Foundation Safety Committee serves to assist in the communication process between employees and management. The committee provides employees with an additional means for communicating concerns regarding workplace health and safety to the members of the committee. The details of the Committee's responsibilities are outlined in section I.

5. Other Communication Methods

A variety of other safety information dissemination methods are used. These include, but are not limited to, the following:

- Pamphlets or fact sheets
- Notification letters and memoranda (for example, Employee Asbestos Notification Letters)
- Periodic spotlight on safety and health issues in generally distributed newsletters
- Posting of regulatory agency inspection findings, Notices of Violations, etc.
- Memoranda containing results of departmental, agency or project safety surveys, results of injury investigations, Safety Committee inspection results, etc.

I. SAFETY COMMITTEE

The primary responsibility of the Safety Committee is to assist SDSURF in maintaining a safe and healthful working environment. The Committee will also assist department, agency and project directors as they work to develop a plan specific to the safety of their particular work environment. The Committee also ensures that employees have a means for communicating safety concerns to management through members of the committee. All employees are encouraged to provide input to the Safety Committee. These responsibilities are in addition to those outlined in section E.4.

The committee is a multidisciplinary committee including individuals qualified by training, experience and position held, to develop, implement and maintain a comprehensive Foundation-wide safety program. The committee membership shall include representatives from the following areas:

1. Risk Management Department
2. Legal Affairs & Human Resources Department
3. Business Services
3. Facilities Management Department
4. Grants and Contracts Administration Department
5. Development Services
6. SDSU Department of Environmental Health & Safety
7. KPBS
8. College of Extended Studies
9. Department of Athletics
10. American Language Institute
11. Workers' Compensation Insurance Carrier

Directors, managers and/or project directors shall endorse and support committee members and their responsibilities to the Safety Committee.

The Risk Manager shall preside over all meetings and have general supervision of the duties of committee members. Other duties of the Risk Manager with regard to the Safety Committee shall include:

1. Carrying out the functions of the safety program.
2. Appointing members to perform the duties of the specific areas of responsibilities outlined below.
3. Providing liaison and information to the Management Practices Group, SDSU's Department of Environmental Health and Safety and other appropriate committees or individuals.
4. Assuring that pertinent committee findings and recommended actions are available to those departments, agencies and projects involved.

5. Maintaining a knowledge base of local regulations through development of reference resources of pertinent documents and publications dealing with all facets of safety, including all applicable building and safety codes and standards.

Members of the Safety Committee are designated or appointed to the committee, by virtue of their position within the SDSUR Foundation, to be responsible for performing other pertinent duties as required for the operation of the program. Those areas of responsibility are Education and Training, Hazardous Materials & Waste Management, Facilities Inspection, Injury Review and Development Services Liaison. The duties for each of those areas of responsibility are as follows:

1. Education and Training - The designated position for this area of responsibility is the Training Coordinator in the Legal Affairs & Human Resources Department.
 - a. Develop safety and health education and training materials and programs to be used in the orientation of new employees, in the continuing education of all employees and in the training of supervisors, according to section K.
 - b. Document and analyze at least annually the education programs to determine their effectiveness.
 - c. Provide internal publicizing of safety in-service presentations and other safety information.
 - d. Maintain records of attendance at safety and health training sessions as required by applicable regulatory authorities.
2. Hazardous Materials & Waste Management - The designated position for this area of responsibility is the Space Coordinator/Property Manager in the Facilities Management Department.
 - a. Ensure that Foundation waste management practices conform with applicable University-established procedures and state, federal and local regulations.
 - (1) Develop procedures that include a process which complies with applicable statutory requirements for identifying hazardous materials and wastes, (e.g., toxic materials, infectious wastes, radioactive materials, etc.) and for managing them using appropriate techniques.
 - (2) Provide annual review of procedures and practices relating to the management of hazardous materials and wastes.
 - (3) Maintain a program for controlling, handling and disposing of hazardous materials.
 - b. Provide training to employees in the safe handling of hazardous materials.

- c. Perform annual departmental review of hazardous substances/wastes program.
- 3. Facilities Inspection - The designated position for this area of responsibility is the Space Coordinator/Property Manager and the Coordinator for Work Control in the Facilities Management Department.
 - a. Establish a quarterly safety inspection schedule.
 - b. Conduct inspections per schedule and make recommendations to correct unsafe conditions.
 - c. Review results of the inspections with the appropriate department, agency or project, and the Safety Committee.
 - d. Follow procedures outlined in section F and carry out other special projects as required by the Director of Legal Affairs & Human Resources.
- 4. Injury Review - The designated position for this area of responsibility is the Workers' Compensation Administrator in the Legal Affairs & Human Resources Department.
 - a. Summarize all accident reports for the Safety Committee:
 - (1) Identification of the accident.
 - (2) Corrective actions or recommendations for preventative measures.
 - (3) Documentation and monitoring as required.
 - b. Maintain appropriate records.
 - c. Carry out the procedures established in section L.
- 5. Development Services Liaison - The designated position for this area of responsibility is the Development Services Associate in the Development Services Department.
 - a. Gather information on any new processes, procedures or equipment that is introduced to the workplace due to new projects.
 - b. Inform the Director of Legal Affairs & Human Resources and the Safety Committee regarding new projects, which might pose a safety or health hazard.

Meetings of the Safety Committee General membership will be held minimally on a quarterly basis. A designee of the Risk Manager will document minutes and attendance of the Committee. The minutes of the Safety Committee and all other records associated with the Committee will be maintained in Risk Management.

J. ENFORCEMENT OF THE PROGRAM

1. Employees who do not follow the SDSUR Foundation's established guidelines for maintaining a safe and healthful work environment or who endanger themselves or others through unsafe work practices will be subject to appropriate disciplinary action up to and including termination. These guidelines include but are not limited to the areas of following safe work practices, using personal protective equipment, observing good housekeeping and general office safety practices, and reporting known hazards to the SDSURF Risk Manager.

Employees should be aware that the existence of disciplinary procedures does not change the at-will status of employment at the SDSUR Foundation. This disciplinary system in no way modifies SDSUR Foundation's at-will employment policy.

2. The SDSUR Foundation will endeavor to ensure that employees comply with the company's health and safety work practices through the training and communication programs outlined in sections H and K. The SDSUR Foundation's training programs will give the employees an introductory awareness of safety and health policies and acceptable work practices as well as an ongoing knowledge of safety and health in the workplace. The communication program will provide education to the employees on required work practices and on means to prevent and avoid workplace injury and illness.

K. SAFETY AND HEALTH TRAINING

Effective dissemination of safety information is essential for a successful Injury and Illness Prevention Program. Experience has shown that training of employees is the single most effective means of reducing injuries and illnesses in the workplace. Training will include general safe work practices as well as specific instruction on control of hazards particular to each employee's job. The Director of Legal Affairs and Human Resources or designee is responsible for insuring that all SDSURF employees are trained appropriately.

1. Scheduled Training

Supervisors shall ensure that safety training is provided to employees as follows:

- a. Upon reporting to work;
- b. Prior to assignment on a new job assignment for which training has not been previously provided;

- c. Whenever new substances, processes, procedures or equipment are introduced to the workplace, which represent a new hazard;
- d. Whenever the supervisor receives notification or obtains knowledge of a new or previously unrecognized hazard.

2. Supervisor Training

Supervisors will be provided with health and safety training, which should be used in conjunction with experience and education to thoroughly familiarize themselves with the nature of hazards to which employees under their immediate direction and control may be exposed. It is key for supervisors to be able to recognize those hazards, know the potential effects these hazards have on the employees, and know the rules, procedures and work practices for controlling exposure to those hazards. The Risk Manager may be consulted when determining the appropriate level of training required for specific assignments.

Employees should be made aware by their supervisor and through formal training of the SDSUR Foundation's Injury and Illness Prevention Program, the Safety Committee and the role the committee plays as a liaison for employees to express their safety and health concerns at work. Employees should be told of their responsibility for reporting any unsafe condition or hazard.

3. Documentation of Training

Appropriate records must be completed and stored to document provision of training. At a minimum, the record must include the date the training was provided, a description of the topic(s) covered, and a listing of participants. The use of the GROUP TRAINING ROSTER, or other applicable records will satisfy IIPP requirements for training documentation.

4. Retention of Training Records

Records shall be kept on file for at least three years within the department, agency or project of the individual who provided or coordinated the training. Alternatively, if a training record is forwarded to the Risk Manager, the Risk Manager will assume responsibility for retaining that record.

All training records should be forwarded to the Risk Manager, after three years the Risk Manager will assume responsibility for that record.

5. Specialized Safety Training

Each supervisor must develop specialized training sessions specifically addressing an employee's unique job assignment or requirements. Supervisors are responsible for understanding his/her employee's job tasks and related hazards. Examples of specialized training include instruction in bio-safety, chemical hygiene, radiation safety, use and care of respiratory protection, unique protocols requiring extreme caution.

6. Types of Training

Many types of training may be used to communicate safety-related information to employees. Training may vary widely with respect to instructional method, setting, subject matter, etc. Types of training applicable to the IIPP include, but are not limited to:

- a. Classroom, audio/video, web-based instruction which involves the presentation of general or specialized safety information to a group of employees in a classroom or conference setting.
- b. Job-site safety meetings, which are informal gatherings of small groups of employees, usually for the purpose of discussing safety matters related to the work being performed in the immediate area; and
- c. On-the-job training, in which a single or small number of employees receive personalized instruction from their supervisor.
- d. Written instruction or training materials.

The selection of a particular type or system of training is the responsibility of supervisors, who should make such decisions on the basis of requirements, needs and available resources.

L. ACCIDENT REPORTING AND INVESTIGATION

Requirements and procedures for the reporting and investigation of accidents are described in this section.

1. All accidents, regardless of severity, must be reported to the immediate supervisor of the injured employee. The supervisor is responsible for ensuring that the Workers' Compensation Administrator is notified as soon as possible, but no later than 8 hours after the incident, so that legal requirements are met and benefit claims are processed. Cal/OSHA requires notification of a serious illness or injury within 8 hours after the employer is informed. (Note: Cal/OSHA defines a serious illness or injury as permanent disfigurement, death, dismemberment or inpatient hospitalization over 24 hours.

2. In emergency situations, employees should seek necessary medical treatment immediately at the nearest medical facility equipped to handle emergencies. The incident should then be reported to the Risk Management Department as soon as possible, but no later than 8 hours after the incident.
3. In non-emergency situations, employees should contact the Workers' Compensation Administrator before seeking medical treatment. If medical treatment is necessary, the Workers' Compensation Administrator will direct employees to a medical facility, which specializes in the treatment of industrial accidents and injuries.
4. The Safety Committee Injury Review representative, in conjunction with the SDSURF Risk Manager and the injured employee's department, agency or project, will investigate the circumstances of the incident to determine the cause. Results of the investigation shall be reported on the Accident, Injury and Illness Investigation Report. (Exhibit 1). As needed, abatement action shall be reported on the Safety Action Report (Exhibit 5).
5. Accident or injury "near misses" should also be reported to the Department Supervisors, who will investigate the situation in the same manner as if an actual accident or injury had occurred.

M. DOCUMENTATION OF SAFETY CONDITIONS AND ACTIVITIES

Safety-related standards and regulations usually specify requirements for the maintenance and retention of records. This section describes the documentation requirements for occupational injuries and illnesses, inspections, and other activities and incidents relevant to occupational safety and health.

1. Accidents, Injuries and Illnesses

It is essential that all accidents, injuries and illnesses occurring on SDSUR Foundation property and agency or project locations are investigated, and that proper records are prepared and maintained. Complete records of all incidents involving bodily injury, property damage, or injury shall be maintained in the Risk Management and analyzed for accident prevention and risk management purposes. It is essential that all such incidents be reported immediately and in writing to the Risk Manager. The SDSURF Risk Manager may generate reports of accident and injury incidents.

Statistics and other information from these records should be made available to departments, agencies or projects. This information should be used to analyze accidents, injuries and illnesses for the purpose of accident prevention efforts.

2. Occupational Injury and Illness Information

- a. The Workers' Compensation Administrator shall maintain a master log and summary of occupational injuries and illnesses.
 - b. Records of occupational injuries and illnesses shall be kept on file in the Legal Affairs & Human Resources Department, and will be made available for review by Cal/OSHA at any time, for a minimum period of five (5) years.
 - c. The Cal/OSHA summary for the previous year will be posted in conspicuous places (e.g. the Legal Affairs & Human Resources Department, the Foundation main building) for review by all employees.
3. Employee Medical Records: "Note" All processes involving employee medical records will comply with the Health Insurance Portability Accountability Act of 1996 (HIPAA)
- a. Employee Medical Records include such documents as
 - (1) Medical and employment questionnaires or histories;
 - (2) The results of medical exams and lab tests;
 - (3) Medical opinions, diagnoses, progress notes, and recommendations;
 - (4) First aid records;
 - (5) Descriptions of treatments and prescriptions; or
 - (6) Employee medical complaints.
 - b. The medical record for each employee shall be preserved and maintained by the Workers' Compensation Administrator for at least the duration of employment plus thirty (30) years. (Note: exceptions are certain health insurance claims records, first aid records of one-time treatment of minor cuts, abrasions, burns, etc., or the medical records of employees who have worked for less than one (1) year if they are provided to the employee upon termination of employment.)
4. Employee Exposure Records

Injury and illness records may not be the only records that require maintenance. Records relevant to the exposure of an employee to a toxic substance or harmful physical agents shall be maintained for 30 years except certain retention periods defined in the California Code of Regulations, Title VIII, Section 3204(d)(1)(B). Exposure records include:

- a. Results of workplace monitoring or measuring of a toxic substance or harmful physical agent;
- b. Biological monitoring results, which directly assess the absorption of a toxic substance or harmful physical agent by body systems;
- c. Records of employees' tasks in areas where regulated carcinogens are used;
- d. In the absence of the above, a chemical inventory or any other record which reveals the identity, location, and use of a toxic substance.

5. Documentation of Activities

Essential records, including those legally required for workers' compensation, insurance audits, and government inspections will be maintained for as long as required. The SDSUR Foundation will also keep records of steps taken to establish and maintain the Injury and Illness Prevention Program. They must include:

- a. Records of scheduled and periodic inspections to identify unsafe conditions and work practices. The documentation includes the name of the person(s) conducting the inspection, the unsafe conditions and work practices identified, and the corrective action(s) taken. These records will be maintained for at least three years.
- b. Documentation of health and safety training for each employee. Specifically, employee name or other identifier, training dates, type(s) of training and the name of the training provider will be included. Records will be retained for at least three years.
- c. Training records will be kept in each department, agency or project and in Risk Management as described in Section K, Safety and Health Training.

6. Employee Access to Exposure and Medical Records

The SDSUR Foundation recognizes that employees and/or their designated representatives and authorized representatives of the Chief of the Division of Occupational Safety and Health (Cal/OSHA) have a right of access to relevant exposure and medical records. Whenever an employee or designated representative requests access to a record, the SDSUR Foundation shall assure that access is provided in a reasonable time, place and manner.