

American Jewish University

INJURY AND ILLNESS PREVENTION PROGRAM (IIPP)



January 2018

1.0 INTRODUCTION

American Jewish University makes all reasonable efforts to:

- Protect the health and safety of University faculty, staff, and students;
- Provide safe workplaces - academic, research, and administrative - for faculty, staff and students;
- Provide information to faculty, staff, and students about health and safety hazards;
- Identify and correct health and safety hazards and encourage faculty, staff and students to report hazards;
- Provide information and safeguards for those on campus and in the surrounding community regarding environmental and safety hazards arising from operations at American Jewish University.

Per California Code of Regulations, Title 8, Section 3203 (<http://www.dir.ca.gov/Title8/3203.html>), American Jewish University has adopted an Injury and Illness Prevention Program (IIPP) which describes specific requirements for program responsibility, compliance, communication, hazard assessment, accident/exposure investigations, hazard correction, training, and recordkeeping.

Requirements outlined in this manual are mandated by regulation where the word “shall” is used and are advisory in nature where the word “should” is used.

2.0 RESPONSIBILITIES

2.1 Program Administrator

The ultimate responsibility for AJU’s IIPP rests with the President of American Jewish University, Robert Wexler.

The program administrator is:

- Name: Sam Levitt
- Title: Vice President Facilities & Auxiliary Services
- Address: 15600 Mulholland Drive, Bel Air, CA 90077
- Telephone: (310) 476-9777, ext. 288
- Email: slevitt@aju.edu
- Responsibilities include:
 - Advising senior management on safety and health issues.
 - Working with senior management to develop safety and health guidelines and policies.
 - Preparing and distributing the University's guidelines, policies and procedures on safety and health issues.
 - Maintaining current information on local, state and federal safety and health regulations.
 - Serving as liaison with governmental agencies.
 - Planning, organizing and coordinating safety trainings.
 - Developing a code of safe practices and inspection guidelines.
 - Arranging for safety and health inspections and follow up to insure necessary corrective action is completed.
 - Establishing, conducting and maintaining an injury/illness/accident report and investigation procedure.
 - Reviewing injury and illness trends.

- Establishing a system for maintaining the records of inspection, hazard abatement and training.

2.2 Senior Managers

Senior Managers are responsible for ensuring that:

- Individuals under their management have the authority to implement appropriate health and safety policies, practices, and programs.
- Areas under their management have adequate funding for health and safety programs, practices, and equipment.
- Areas under their management are in compliance with American Jewish University health and safety practices, policies, and programs.

2.3 Supervisors

Supervisors are responsible for implementing American Jewish University IIPP. This includes:

- Ensuring that workplaces and equipment are safe, well maintained, and in compliance with external agency regulations and American Jewish University policies, programs, and practices.
- Ensuring that workplace safety and health practices and procedures are clearly communicated and understood by employees through training programs.
- Enforcing health and safety rules fairly and uniformly relating to job performance.
- Evaluating employees on compliance with safe work practices.
- Acknowledging employees who make a significant contribution to maintenance of a safe workplace and disciplining employees who fail to follow safe work practices.
- Encouraging employees to report workplace hazards without fear of reprisals.
- Ensuring that periodic, scheduled workplace inspections are conducted and that identified health and safety deficiencies are corrected in a timely fashion.
- Ensuring that workplace incidents (injuries, exposures, or illnesses) are reported, investigated, and that corrective actions are taken promptly. See Sections 6.1 and 6.2 regarding procedures for reporting serious and non-serious incidents.
- Ensuring that inspections/investigations and employee health and safety records are kept for the designated period(s) of time.

2.4 Employees

Employees are responsible for following the requirements of the IIPP. This involves:

- Keeping themselves informed of conditions affecting their health and safety.
- Participating in training programs as required.
- Adhering to healthy and safe practices in their workplace.
- Promptly reporting to their supervisors of potential hazards in the workplace and workplace incidents (injuries, exposures, or illnesses).

2.5 Human Resources Department

The Human Resources Department is responsible for the development and administration of the IIPP.

This involves:

- Providing training and technical assistance to managers and supervisors on implementation of the IIPP.
- Assisting supervisors in conducting workplace hazard assessments to identify, evaluate, and correct hazards.
- Reviewing, updating and evaluating the overall effectiveness of the IIPP.

- Evaluating the adequacy and consistency of training designed by schools, departments, etc. (i.e., Tier 2 Training - See Section 8.2).

3.0 COMPLIANCE

American Jewish University shall ensure that employees comply with safe and healthy work practices.

Managers and supervisors are responsible for establishing and maintaining good health and safety practices. To ensure compliance:

- Employees are recognized for following safe and healthful work practices (e.g., oral acknowledgments at receptions, certificates of appreciation, etc.).
- Employees are trained and retrained, as necessary or as required.
- Health and safety practices are integrated into new employee job descriptions and performance appraisals.
- Disciplinary actions with employees for failure to follow safe and healthful work practices are taken, when appropriate.
- An anti-reprisal policy for employees reporting safety and health concerns is enforced.

4.0 COMMUNICATION

American Jewish University shall communicate with employees in a form readily understandable by all affected employees on matters related to occupational safety and health, including provisions designed to encourage employees to inform their supervisors of hazards at the worksite without fear of reprisal.

The various communication systems AJU uses to relay information to all employees on matters relating to occupational safety and health, include:

- The tri-tier training program
- Health and safety publications
- Health and safety meetings
- University Safety Partners
- Anonymous and confidential hazard reporting
- An anti-reprisal policy

These systems are described below:

4.1 Training

A tri-tier training program is an integral component of the communication system. The training program is described in Section 8.

4.2 Health and Safety Publications

Health and safety publications are available from Human Resources. Contact the Human Resources Office to request copies.

4.3 Health and Safety Meetings

Health and Safety meetings at the school, department or unit level are conducted to reinforce important concepts including, but not limited to the following:

- Clearly communicate health and safety programs and procedures to the employees and students.
- Encourage employees and students to report workplace hazards to management without fear of reprisal as described in Section 4.6.
- Encourage employees and students to report workplace incidents (injuries, exposures, and illnesses).

4.4 University Safety Partners

- Represent the key departments and schools of the University.
- Communicate with respective departments about health and safety matters or to ensure the implementation of applicable Injury & Illness Prevention programs.
- Meet regularly to discuss campus-wide safety issues and to share safety concerns with Human Resources.

4.5 Anonymous Hazard Reporting

- To report a hazard or share a health and safety concern, employees may call (310) 476-9777, ext. 288 or submit a concern to the program administrator via email at iipp@aju.edu
- Hazard reporting may be done anonymously or confidentially.

4.6 Anti-Reprisal Policy

Employees and students shall not be discharged or discriminated against in any manner for bona fide reporting of health and safety hazards to American Jewish University or to appropriate governmental agencies. Supervisors shall inform employees and students of this policy and encourage reporting of workplace hazards to the management.

5.0 SCHEDULED AND PERIODIC INSPECTIONS

American Jewish University shall have procedures for identifying and evaluating work place hazards, including scheduled periodic inspections to identify unsafe conditions and work practices. Supervisors are responsible for seeing that periodic inspections are conducted. To assist supervisors, Human Resources has developed self-inspection checklists that can be adapted for local use.

5.1 Work Area Inspection Schedule for Supervisors

Work area inspections shall be conducted according to the following schedule:

- Upon initial establishment of IIPP.
- Recommended frequency:
 - Office areas: Annually
 - Labs and Shops: Quarterly
- When new substances, processes, procedures or equipment which present potential new hazards are introduced.
- When new, previously unrecognized hazards are identified.
- When occupational injuries or illnesses occur.

5.2 Internal Audit

- To assist supervisors in identifying and correcting potential hazards, Human Resources conducts surveys (e.g., baseline occupational health and safety surveys of operating units, inspections of hazardous materials storage/disposal, fire safety).

- American Jewish University’s Senior Management Committee includes a review of the unit’s compliance with health and safety issues related to the implementation of this IIPP.

5.3 Outside Agencies

Several outside agencies conduct regular, periodic inspections at AJU, which assist the University in achieving some of its inspectional responsibilities. These include:

- City of Los Angeles Fire Department
- County of Los Angeles Environmental Health Department
- County of Los Angeles Department of Building and Public Safety

5.4 Recordkeeping of Scheduled and Periodic Inspections

Records of scheduled and periodic inspections to identify unsafe conditions and work practices shall be maintained by Human Resources for a minimum of one year (unless otherwise specified). The records shall include:

- The person(s) conducting the inspection,
- Any description of the unsafe conditions and work practices,
- The actions taken to correct the identified unsafe conditions and work practices.

6.0 INJURY AND ILLNESS REPORTING AND INVESTIGATION

American Jewish University shall investigate workplace incidents (injuries exposures, or illnesses). The following standardized procedures for reporting and investigating workplace injuries, illnesses, and incidents are reviewed below.

6.1 Reporting Procedures

Employees are to report workplace incidents (injuries, exposures, or illnesses) to their supervisor immediately.

6.1.1 Serious Injuries/Illnesses or Fatalities

- Supervisor immediately contacts the program administrator at (310) 476-9777, ext. 288 and via email at iipp@aju.edu to report work related death or serious injury/illness.
- Cal/OSHA defines an injury or illness as “serious” if it:
 - Requires inpatient hospitalization for a period in excess of 24 hours for other than medical observation; or
 - An employee suffers a loss of any member of the body; or
 - An employee suffers any serious degree of permanent disfigurement.
- The Program administrator immediately reports any serious injury, illness, or fatality to CalOSHA. Other incidents may be reported on a case-by-case basis

6.1.2 Standardized Forms

Standardized forms for reporting and investigating workplace incidents (injuries, exposures, or illnesses) are available through Human Resources

6.2 Investigation Procedures

Within 24 hours of occurrence, supervisors must investigate any workplace incident (injury, exposure, or illness) involving their staff and follow-up with corrective measures via completion of an incident report form.

6.2.1 Human Resources Review of Incidents:

- All serious accidents (described in Section 6.1) and overexposures to chemical, biological, radiation, and physical stressors are investigated immediately by Human Resources as appropriate.
- For other incidents where additional follow-up is appropriate, Human Resources reviews submitted incident report information to help ensure adequate corrective actions have been identified and implemented.

7.0 HAZARD CORRECTION

As established by California Occupational Health and Safety Administration (Cal-OSHA) regulations. American Jewish University is committed to correct unsafe or unhealthy work conditions in a timely manner, based on the severity of the hazards.

7.1 Schedules for Correcting Hazards

Hazards shall be corrected according to the following procedures:

- When observed or discovered;
- When an imminent hazard exists which cannot be immediately abated without endangering employee(s) and/or property, all exposed personnel will be removed from the area, except those necessary to correct the existing condition.
- Employees necessary to correct the hazardous condition shall be provided with necessary safeguards.

7.2 Recordkeeping

- As corrective actions are implemented, supervisors shall document the effort and provide to Human Resources to maintain such record for at least one year.

7.3 Resources

- Unsafe conditions that cannot be corrected with resources available to the supervisor or manager must be reported to the next higher level of management. Resources to correct hazards include the following:
 - Facilities - If the correction required is part of Facilities Operations maintenance responsibilities, Facilities will address the repair without charge to the department.
 - Departmental Funds - If the repair does not fall into the category of maintenance, departmental funds may be required.
 - School/University Funds- If departmental funds are not available, departments must seek other resources from the school or University.

8.0 TRAINING AND INSTRUCTION

8.1 Training Content

American Jewish University policy requires that faculty, staff and students shall be trained to protect themselves from hazards in their working environment. Supervisors shall train employees and students in:

- General health and safety practices;
- Job-specific health and safety practices and hazards;

- Recognition and assessment of health and safety risks;
- Minimization of risks through sound safety practices and use of protective equipment;
- Regulations and statutes applicable to their work; and,
- American Jewish University health and safety policies

8.2 Tri-Tier Training Program

American Jewish University has organized its training system into a tri-tier program, which is described below:

- Tier 1: General Safety Training
 - General University orientation provided by Human Resources to all new employees.
 - Includes information on AJU's health and safety policies and practices, employee health and safety rights and responsibilities, health and safety services at AJU, what the employee should expect in terms of further training.
- Tier 2: Hazard-Specific Training
 - Provided by the school, Department or building safety representatives in conjunction with Human Resources to employees in labs, shops, or other workplaces where special hazards may be encountered.
 - Training topics include ergonomics, hazard communication, departmental emergency response/evacuation procedures, forklift safety,
 - Human Resources reviews Tier 2 Trainings for adequacy and consistency.
- Tier 3: Job-Specific Training
 - Provided by the supervisor for facilities staff, shop and food service workers, or other employees and students as appropriate.
 - Training consists of information specific to the hazards and equipment used by these individuals.
 - Training is communicated by one or more of the following methods: safety meetings (formal or informal), material safety data sheets, videos, pamphlets, booklets, and postings.

8.3 Training Schedule

Training shall be provided to all employees:

- When the IIPP is first established;
- When new employees are hired;
- When employees are given new job assignments for which training has not previously been received;
- Whenever new substances, processes, procedures or equipment are introduced to the workplace and represent a new hazard;
- Whenever the employer is made aware of a new or previously unrecognized hazard;
- When employees become supervisors (so that they can familiarize themselves with the safety and health hazards to which employees under their immediate direction and control may be exposed).

8.4 Training Resources from Human Resources

- Human Resources assists schools and departments in providing health and safety training to employees on a variety of topics. These include IIPP training, laboratory safety training, respirator training, radiological safety, and many others.

- Human Resources has developed standardized forms for training recordkeeping. These are available from Human Resources.
- Human Resources has a safety video library, a collection of safety publications, and technical staff to assist supervisors and departments in implementing training programs.

8.5 Recordkeeping

- Documentation of health and safety training for each employee shall include: (1) employee name or other identifier, (2) training dates, (3) type(s) of training, and (4) training providers. This documentation shall be maintained for one year.
- Training records of employees who have worked less than one year for the employer need not be retained beyond the term of employment if they are provided to the employee upon termination of employment.
- The supervisor is responsible for maintaining these records and providing them to Human Resources.