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## Illness and Injury Prevention Program (IIPP)

### 924.1 PURPOSE AND SCOPE

To ensure the safety of the public, employees, and offenders that use San Diego County Probation Department equipment and facilities, and to ensure compliance with California Code of Regulations, Title 8, Sections 1509 and 3203.

This policy applies to all departmental employees, as well as public service workers assigned to Work Projects.

### 924.2 APPLICABILITY

This policy applies to all Department employees, as well as the public service workers assigned to Work Projects.

### 924.3 POLICY

The department will establish and maintain an effective Injury and Illness Prevention Program (IIPP) per Title 8, Sections 1509 and 3203 that contains the following elements:

- A. Person(s) responsible for developing, implementing and updating the IIPP.
- B. System for ensuring that all employees comply with safe and healthful work practices.
- C. Two-way safety communications system between employer and employee.
- D. Health and safety inspection programs.
- E. Procedures for correcting unsafe/unhealthy conditions.
- F. Procedures for accident investigations.
- G. Health and safety training and instruction.
- H. Record Keeping and documentation.

### 924.4 RESPONSIBILITIES FOR HEALTH AND SAFETY

The Chief Probation Officer is responsible for designating a Departmental Safety Officer as well as a Facility Safety Officer at each Probation site.

The responsibilities for health and safety shared amongst all staff according to the Injury and Illness Prevention Program are as follows:

- (a) Departmental Safety Officer
  - 1. (a) Ensure that all IIPP is developed, implemented and updated as necessary (at least annually or an as needed basis).
  - (b) Delegate responsibilities to others to ensure the IIPP is comprehensive and effective.
  - (c) Provide the resources to ensure safe and healthful conditions.
  - (d) Promote worker safety and accident prevention programs.

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- (e) Investigate and oversee the investigation of all accidents.
- 2. Facility Safety Officer
  - 1. Conduct inspections of facility related safety items.
  - 2. Coordinate the correction of deficiencies noted or brought to their attention.
  - 3. Keep records of facility inspections.
  - 4. Notify Departmental Safety Officer of deficient items that are not facility related (or at least have a non-facility related component).
- 3. Supervisors
  - 1. Recognize potential hazards.
  - 2. Ensure that all operations are performed with the utmost regard for health and safety.
  - 3. Evaluate the performance of their staff for compliance with safe and healthful work practices.
  - 4. Identify training needs.
  - 5. Coordinate training and investigate accidents.
  - 6. Promote positive attitudes towards health and safety for themselves and their employees.
- 4. Employees
  - 1. Comply with all rules and regulations in this and other health and safety documents.
  - 2. Report accidents and injuries.
  - 3. Attend training sessions.
  - 4. Recognize that they are accountable for their own health and safety and their actions.

#### **924.5 COMPLIANCE**

The Department's system for employee compliance with safe and healthful work practices includes:

- (a) Establish a communications system to keep employees informed of health and safety regulations.
- (b) Distribute applicable safety policies.
- (c) Ensure that each employee receives adequate training in the tasks that he/she is to perform, including any re-training of an employee when a task has not been done to standard.
- (d) Evaluate working conditions and practices for all employees in order to minimize hazards.

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- (e) Identify and correct unsafe and unhealthful conditions and work practices through health and safety inspections.
- (f) Use established procedures for disciplinary action to ensure that employees comply with health and safety regulations and work practices. Disciplinary action can include oral or written reprimand, suspension, demotion and/or termination.
- (g) Evaluate the safety performance of all workers.
- (h) Recognize employees who perform with safe and healthful work practices.
- (i) Develop and maintain and Emergency Action Plan.

#### **924.6 COMMUNICATION**

The Department's system for communicating health and safety information includes:

- (a) Health and safety bulletin boards shall be established in each facility. This board shall contain Cal/OSHA poster, Worker's Compensation poster, Cal/OSHA Summary of Work Related Injuries and Illnesses (Form 300A), Access to Medical Exposure Records, safety bulletins, procedures for filing health and safety complaints, and any other information to communicate with employees concerning health and safety. The Facility Safety Officer is responsible for maintaining this board at his/her designated facility.
- (b) Employees are encouraged to inform their supervisor, either verbally or in writing, of any hazards at the work site. The supervisor is then responsible for investigating the complaint and for taking appropriate action.
- (c) Safety complaints may be made directly to the Department of Human Resources, Risk Management Unit (858) 694-3800. Occupational health complaints may be made directly to the Occupational Health Program, Department of Environmental Health at (858) 694-2888. These units will investigate the complaint and recommend corrective action, if necessary, to the Departmental Safety Officer.
- (d) Safety and occupational health complaint forms can be utilized by any employee to register a safety or health complaint. This form will first be reviewed by the Departmental Safety Officer then forwarded, if necessary, to the DHR Risk Management Unit or the Occupational Health Program for further review and investigation.
- (e) There shall be no reprisal against any employee who makes a safety or health complaint.
- (f) When a written complaint is filed by an employee, the employee shall be notified of the action taken on the complaint.

#### **924.7 HEALTH AND SAFETY INTERNAL INSPECTIONS**

An internal health and safety inspection to identify unsafe and unhealthful conditions and work practices shall be conducted in each facility at least annually or when:

- (a) The IIPP is first established.
- (b) New substances, processes, procedures, or equipment is introduced in to the work environment.

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- (c) New or previously unidentified hazards (physical, mechanical, chemical, biological, ergonomic and/or stress) are recognized.
- (d) Occupational injuries, "near misses" or illnesses occur.
- (e) Employees are assigned tasks for which a hazard evaluation has not been previously conducted.
- (f) High hazard areas will require an inspection to be conducted on a minimum of a quarterly basis.

#### Inspections Conducted by Other Departments:

To supplement the health and safety inspections conducted by the Department, and to identify unsafe and unhealthful conditions and work practices, scheduled and unscheduled periodic health and safety inspections shall be conducted by other departments.

#### Inspections Conducted by Cal/OSHA:

Cal/OSHA may conduct an inspection as a result of a complaint or on a routine basis. Cal/OSHA inspectors will be allowed to perform the inspections; however, the following County representatives must be notified:

- (a) Departmental Safety Officer
- (b) DHR, Risk Management Division
- (c) Occupational Health Program
- (d) Department of General Services (DGS), Facilities Services Division (if facility-related).

If a Cal/OSHA citation is received, the Department will send a copy of the citation and related documents to the above representatives within five (5) days for consultation on corrective action and/or appealing citation. If the citation needs to be appealed, the appeal will be initiated by these divisions in conjunction with the Department receiving the citation.

#### **924.8 PROCEDURES FOR CORRECTING UNSAFE/UNHEALTHY CONDITIONS**

When an unsafe/unhealthy condition is identified, the Department is responsible for initiating corrective action in an expeditious manner. The more hazardous exposures shall be given priority.

When an unsafe or unhealthy work condition is identified, the following County representatives must be notified:

- (a) Department of General Services (if the hazard is facility-related).
- (b) Supervisor, IIPP Administrator, and Management depending on the severity of the hazard.

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When a serious or imminent hazard is found, the employees must be protected against this hazard until it is corrected. This can include discontinuing the activity until the hazard has been corrected or eliminated.

If the hazard is not serious, it should be corrected as soon as reasonably possible with a documented timeframe for correction.

The Department of General Services is responsible for resolving unsafe or unhealthy conditions as they relate to the maintenance of County owned buildings. In leased facilities, this responsibility is dependent on the lease agreement terms and conditions, and can be assigned to the County or the lessor.

#### **924.9 ACCIDENT PROCEDURES AND REPORTING**

An accident is defined as any injury or illness that arises out of and/or in the course of employment.

Employees shall immediately report all accidents to their supervisor unless this reporting would cause a delay in medical care that would compromise their health (e.g., a serious or life threatening condition). In this situation, the employee shall report the accident to their supervisor as soon as possible.

Whenever an employee suffers a work related injury or illness an Employee's Claim for Worker's Compensation Benefits, Form DWC-1 and General Claim Worksheet, Form RM10 must be completed as soon as possible after the injury/illness has occurred. If the employee seeks medical attention then a medical work status report (doctor's note) must be submitted.

The employee's supervisor shall review the General Claim Worksheet, Form RM10 and investigate the reported injury or illness and complete a Supervisor Accident Report, Form RM3.

All Workers' Compensation claims will be coordinated with Department Human Resources staff.

The accident investigation is a means of gathering information that can be systematically analyzed to determine what must be corrected to prevent reoccurrence of similar accidents. This will include a review of the accident by the supervisor and/or Facility Safety Officer and may include an investigation by the DHR, Loss Prevention/Safety Division, and investigation by local law enforcement and/or another outside investigative agency. Corrective action should be initiated based on the accident investigation results as follows:

- (a) If the accident was caused by a work practice or condition that was not previously recognized as unsafe, the Department will:
- Provide necessary instructions for doing the job right.
  - Check frequently to ensure that instructions are being followed.
  - If violations are observed, find out why and supplement existing instructions.

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- (b) If the accident was caused by a work practice that was in violation of an established operating rule or practice, the Department will:
- Determine what rule or practice was in violation.
  - Take necessary action to correct the situation.
  - Check frequently to be certain that instructions are being followed.
  - If violations are observed, find out why and supplement instructions.
- (c) If the accident was caused by a work practice that was contrary to the right method, but for which specific instructions or rules had not been established, then the Department will:
- Determine the need for specific instructions or rules and give necessary instructions.
  - Check frequently to be certain that instructions are being followed.
  - If violations are observed, find out why and supplement the instructions.
- (d) If the accident was caused by a repeat of the same causes of a previous accident, the Department will:
- Determine why previous corrective measures were not effective.
  - Determine the action necessary to make them effective.
  - Check frequently for compliance.
  - If violations are observed, find out why and supplement corrective action as necessary.

A fatal or serious injury accident or serious occupational illness exposure incident must be reported immediately to the Chief Probation Officer and to the DHR Worker's Compensation Division at (858) 694-3800. The Department must report all work-related hospitalizations, amputations and loss of an eye to OSHA within 24 hours of learning about it. The Department must report work-related fatalities to OSHA within 8 hours of learning about it.

The Accident Review Board, established by the Chief Probation Officer, is to review every vehicle accident involving its employees and to make appropriate recommendations to the Chief Probation Officer. Such reviews should cover vehicle accidents involving County- owned and/or private mileage vehicle accidents involving County-owned and/or private mileage vehicles when used on County business. Primary responsibility of the review committee shall be to determine, if possible, the cause of the accident and whether the employee took every reasonable precaution to avoid it or to minimize the effects.

#### **924.10 HEALTH AND SAFETY TRAINING AND INSTRUCTION**

The Department shall develop a training program to ensure that employees receive adequate health and safety training. This program shall include:

- (a) Instruction to employees in universal safe and healthful work practices, which include:
- IIPP

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- Back Safety and Lifting
  - Defensive Driving and Driving Standards
  - Emergency Action Plan
  - Ergonomics
  - Officer Safety Program (including electrical safety and slips/trips/falls)
  - Security and Workplace Violence Program
  - Staying Healthy: Minimizing Exposure to Colds, Flu, etc.
- (b) Specific instructions with respect to hazards unique to the employee's job assignment, which may include:
- (a)
    - First Aid/CPR
    - Health Illness Prevention Program
    - Field Hazards
    - Personal Protective Equipment
    - Respiratory Protection
    - Blood borne Pathogen Program
    - Other Biohazards
    - Fire Safety
- (c) This training shall be provided:
- When the IIPP is first established.
  - To all new employees.
  - To all supervisors.
  - Whenever a new type of substance, process, procedure or equipment is introduced to the work place and whenever the employer receives notification of a new hazard or previously unrecognized hazard.
- (d) Specialized training programs can be requested from the DHR, Loss Prevention Unit and the Occupational Health Program, Department of Environmental Health.
- (e) All training will be documented in the County's Learning Management System (LMS) or per Departmental procedure.

#### **924.11 RECORD KEEPING AND DOCUMENTATION**

The Department shall be responsible for maintaining the following records:

- (a) The IIPP is kept in the Shared drive (S:/) and is available for employees to review.
- (b) Copies of all accident investigation reports are maintained for five (5) years by the Departmental Safety Officer.

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- (c) Cal/OSHA Log and Summary of Occupational Injuries and Illnesses, Form 300 which is maintained by the DHR Risk Management Division. DHR Risk Management will forward Cal/OSHA Form 300A to the Department by February 1st of each year and the Facility Safety Officers will post the annual OSHA Form 300A summary on the safety bulletin board.
- (d) Periodic hazard inspections and corrective measures records are maintained for three (3) years by the Department Safety Officer.
- (e) Health and Safety Training Records are maintained in the County's Learning Management System (LMS) and information will be maintained by the Department Safety Officer.
- (f) Employee Exposure Records are maintained by the Departmental Safety Officer according to the California Code of Regulations, Title 8, Section 3204.
- (g) Employee Medical Records are maintained by DHR, Risk Administration Division, according to the California Code of Regulations, Title 8, Section 3204.

#### References:

California Code of Regulations, Title 8, Section 1509, Construction Safety Orders

California Code of Regulations, Title 8, Section 3203, General Industry Safety Orders