

California Montessori Project

Injury and Illness Prevention Program (IIPP)

CCR Title 8, § 3203



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Preface

Purpose of This Document

The California Montessori Project (CMP) is committed to providing a safe and healthy environment for all staff, students, and parents. In pursuit of this endeavor, the CMP Injury Illness Prevention Program (IIPP) has been established to provide a framework for CMP to ensure a safe and healthy work environment for all of its employees.

The goal of the program is to eliminate occupational injuries and illnesses. This program has been developed and implemented as required under the California Code of Regulations (CCR), Title 8, Chapter 4, Subchapter 7, and Section 3203.

The purpose of this document is to provide information necessary to communicate the elements of the IIPP.

Intended Audience

The IIPP guidelines and procedures described in this document are designed for use by CMP administration and staff. Administration and employees are encouraged to read this document and are required to follow the guidelines and procedures set forth in this document, unless otherwise stipulated.

What's Inside this Document

This document provides the following information:

- ▶ **Section 1, Program Statement**
Describes the commitment of CMP to this IIPP program and the reasons for developing this IIPP
- ▶ **Section 2, Responsibility**
Defines the IIPP-related responsibilities of employees and specific CMP Administrative personnel
- ▶ **Section 3, Compliance**
Describes CMP's commitment to compliance and actions to be taken if employees do not comply with the IIPP program
- ▶ **Section 4, Communication**
Discusses the means of communicating IIPP requirements between administrators and staff
- ▶ **Section 5, Hazard Assessment**
Discusses the process for assessing and analyzing hazards to which CMP staff may be exposed
- ▶ **Section 6, Hazard Correction**
Describes the responsibilities and process related to correcting hazards in the workplace

- ▶ **Section 9, Return to Work Program**
Explains the policies and procedures regarding assignments for employees with modified work restrictions
- ▶ **Section 10, Training and Instruction**
Discusses the methods of training employees on safety issues
- ▶ **Section 11, Record Keeping**
Identifies the requirements for storing safety related documentation

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Program Statement

The California Montessori Project (CMP) is committed to providing a safe and healthy workplace for all of its employees. The personal safety of each CMP employee while in performance of his or her work activity is of primary importance.

This Injury & Illness Prevention Program (IIPP) has been developed to ensure CMP takes measures to effectively reduce the number of occupational injuries and illnesses. The success of this program is to be achieved through the continuous mutual cooperation and support of management and employees.

CMP is also committed to creating a safe and healthy workplace for, outside contractors, and other workers who may be working at network sites.

Responsibility

Overview

This section of the CMP IIPP defines the responsibilities of the Safety/Risk Management Team, CMP administrators, and employees. Employee rights are also listed.

Safety/Risk Management Team

The Safety/Risk Management Team (The Team) will coordinate the IIPP for CMP. The Team is responsible for implementing and maintaining the following aspects of the safety program:

- ▶ Coordinating all risk control activities
- ▶ Maintaining, evaluating, and revising the IIPP and conducting investigation of disabling injuries
- ▶ Providing advice and guidance to Network and Site Administrators
- ▶ Communicating safety objectives
- ▶ Developing and/or assisting in the development of employee training programs
- ▶ Presiding over the CMP Safety Committee
- ▶ Reviewing all accident reports and investigations
- ▶ Providing support to the Network in adhering to applicable federal, state, and local safety codes
- ▶ Serving as liaison between administrators and outside safety agencies

Management Responsibilities

CMP establishes responsibility for the implementation of this IIPP. The Executive Director is responsible for overseeing that the operations of the Network are conducted in accordance with these provisions of the IIPP. The Team will facilitate the implementation and maintenance of this program.

Network employees with management responsibilities include the Executive Director, Administrators, Site Safety Coordinators, and any other employee charged with a management role. Management is responsible, where appropriate, for specific elements of the IIPP as follows:

- ▶ Managing the injury prevention efforts in their area of responsibility
- ▶ Providing the necessary means of ensuring a safe and healthy work environment for their staff
- ▶ Providing administrators and employees with safety training and job instruction

- ▶ Managing a planned safety meeting and safety updates
- ▶ Managing safety discipline
- ▶ Facilitating compliance with applicable federal, state, and local safety codes. Cal/OSHA safety regulations can be found in CCR Title 8. These regulations can be accessed via the Internet at: www.ccr.oal.ca.gov or www.dir.ca.gov
- ▶ Participating in the investigation of disabling injuries
- ▶ Directing staff of the authorizing district to check with their applicable district supervisor regarding their responsibilities

Site Administrator Responsibilities

Site Administrators have an integral role within the IIPP. Site Administrators are in constant and direct contact with their employees and can greatly influence safety attitudes and practices. It is essential that Site Administrators set the example for employees in regards to safety responsibilities. There are several specific responsibilities for Site Administrators in conjunction with Site Safety Coordinators, as follows:

- ▶ Taking any reasonable action necessary to prevent injuries where an immediate danger exists
- ▶ Taking responsibility for safety of all employees under their supervision and for any employee not under their supervision but at the supervisor's work site
- ▶ Taking responsibility for safety of all employees that may be in the work area
- ▶ Providing and maintaining a clean and hazard-free work area
- ▶ Providing safety orientation and job instruction of supervised employees
- ▶ Planning, conducting, and documenting safety evaluations in assigned areas of responsibility
- ▶ Conducting planned safety meetings with employees
- ▶ Conducting safety observations of employee safe work practices
- ▶ Developing and maintaining cooperative safety attitudes in employees through the application of approved methods or preventive and corrective discipline

Maintenance & Operations Responsibilities

The CMP Site Administrators have a critical role in overseeing the maintenance of their sites and keeping their facilities in proper and safe condition. The IIPP-related responsibility of the Site Administrator is to report the following to the appropriate parties:

- ▶ Maintenance work requests concerning safety related issues. These maintenance requests must be given the highest priority
- ▶ Procedures used in accordance with Cal/OSHA lock-out, block-out and tag-out regulations will be adhered to for locking, blocking, and tagging out unsafe equipment, electrical circuitry, and equipment with moving parts. Lock-out, block-out and tag-out procedures will be used if equipment is in need of repair or is no longer in use
- ▶ All equipment is being used in a safe manner for which the equipment is intended and in accordance with manufacturers' instructions and recommended rules for safe operation

- ▶ Contracting with outside vendors as necessary to complete repairs
- ▶ Posting applicable safety related signs as requested by Network and Site Administrators

Employee Responsibilities

Employees are charged with adhering to the IIPP as directed by CMP administrators. Employees are responsible for:

- ▶ Adhering to all safety rules and operating procedures established by the CMP Network
- ▶ Wearing appropriate Personal Protective Equipment (PPE) as required and provided by the Network
- ▶ Inspecting and maintaining equipment for proper and safe operation
- ▶ Reporting all injuries immediately
- ▶ Encouraging other workers to work in a safe manner
- ▶ Reporting all observed unsafe acts and conditions to their Site Administrator or Site Safety Coordinator
- ▶ Reporting to work in an acceptable condition and not under the influence of alcohol or drugs

Employee Rights

Employees have several rights with respect to occupational safety. Employees have the right to:

- ▶ Safe and healthy working conditions
- ▶ Receive training in general safe work practices and specific training with regard to hazards unique to any job assignment
- ▶ Refuse work that would violate a health and safety standard or order where such violation would pose a real and apparent hazard to their safety or health

Compliance

Overview

This section of the IIPP describes the CMP's commitment to compliance, expectations regarding employee compliance, and action to be taken if employees do not comply with their responsibilities under the IIPP program.

CMP Commitment

CMP is committed to the following:

- ▶ Providing all employees a safe and healthy work environment
- ▶ Providing all necessary Personal Protective Equipment (PPE) and safety training
- ▶ Maintaining an open door policy allowing all employees to communicate any safety concerns
- ▶ Adhering to all applicable federal, state, and local safety regulations
- ▶ Providing full cooperation with any outside safety agency during the course of any inspection or audit

Employee Compliance

Occupational safety and health regulations and workplace practices are designed to reduce or eliminate employee occupational injuries and illnesses. Employee compliance with all rules and regulations is essential to maintaining a safe and healthy workplace. Employees who violate any safety policy, procedures, rules, and/or regulations may be subject to disciplinary action.

Disciplinary Action

CMP utilizes applicable and appropriate disciplinary actions with employees who violate network policies, rules, and procedures; with the objective of correcting unacceptable behavior or performance of an employee. In the event an employee violates any safety rules or requires any counseling as a result of unsafe work practices, the incident should be reported immediately to the employee's site administrator and/or human resources for further guidance.

Communication

Overview

This section of the CMP IIPP discusses the requirements for communicating IIPP compliance between administration and staff. Information is provided regarding communication mechanisms such as employee training, program reviews, Network Safety Committee meetings, and printed and posted literature.

General Information

CMP recognizes that open, two-way communication between administration and staff on health and safety issues is essential to an injury-free, productive workplace.

- ▶ Site Administrators and Site Safety Coordinators are responsible for communicating with all employees about occupational safety and health issues in a manner or form readily understandable by all employees.
- ▶ Employees are encouraged to inform their site administrators about workplace hazards without fear of reprisal.

The system of communication regarding safety and health at CMP consists of several facets of delivery designed to facilitate a continuous flow of safety and health information between administrators and staff. Such delivery methods include site training sessions for new employees, ongoing safety training for all staff, minutes of Network Safety Committee meetings, and posted or distributed information.

New Employee Orientation

All new CMP employees are required to attend new-hire orientations; network and site. Safety information to be communicated to each employee at these orientations will include, but not be limited to, fire procedures, hazard communication, back injury prevention, and injury reporting. Please note first aid, CPR, and blood borne pathogen training are conditions of employment and employees are responsible to keep their certifications current on their own time at their own expense.

Documentation of all new employees attending new-hire orientations will be maintained in the Human Resources Department.

Training Programs

CMP is committed to providing all necessary safety training to its employees. Safety training programs are necessary for CMP to communicate to employees the hazards associated with their positions and safe work practices necessary to mitigate those hazards.

Training will be communicated through, but not limited to, dialog between trainer and trainee, on-line courses, webinars, safety literature, hands-on example, on-the-job training, staff meeting presentations, seminars, and workshops. Communication during training sessions should be two-way and interactive to ensure employees understand their training and are afforded the opportunity to ask questions to clarify any information they may not understand initially.

The Team will review the effectiveness of specific training programs and recommendations will be communicated to the necessary personnel or agencies conducting the training.

Network Safety Committee

The Network Safety Committee has two primary functions:

- ▶ Facilitate communication between The Team and employees
- ▶ Monitor the effectiveness of CMP's IIPP

The Network Safety Committee is CMP-wide and is comprised of both administrators and staff. Each site should be represented with employees of various classifications on a volunteer basis.

The Network Safety Committee will meet regularly (at least quarterly). Meetings may include a review of the Safety Operations Plan, review and update of the IIPP, table top exercises and review best practices for safety compliance.

Members of the Network Safety Committee are to provide feedback to The Team regarding organizational and operational issues which are directly affecting injuries and Workers' Compensation costs.

Posted/Distributed Information

CMP is committed to providing its employees with accurate and timely safety information. Safety literature, policies/procedures, concerns, and other safety information will be posted in an area accessible to all employees and posted on the CMP web site.

Warning signs and other indicators of a hazardous condition will also be posted at the work site where hazards exist in accordance with applicable laws or CMP policies.

Review of Injury & Illness Prevention Program

This IIPP is to be used as a reference source for safety information pertaining to CMP. All employees are entitled to review the contents of this IIPP. Each site should have a copy of the program, which must be kept at a location readily accessible to all employees.

All new employees will be informed of the program during orientation.

All employees will be made aware and have access to any revisions to the program as the revisions are made.

Hazard Assessment

Overview

This section of the IIPP discusses the process for assessing and analyzing hazards to which CMP employees may be exposed.

Hazard Reporting

It is the responsibility of all employees to report unsafe work conditions and practices to their appropriate Administrator. Unsafe Conditions can be reported to the Site Safety Coordinator, Site Administrator or Human Resources Department as appropriate. These reports should be done in writing and can be submitted anonymously if needed.

CMP is committed to conducting complete and thorough investigations of all reports of hazardous conditions. If conditions are determined to be hazardous, appropriate measures will be taken by the appropriate parties to correct those conditions.

Workplace Hazard Detection

The detection of hazards in the workplace is essential in ensuring a safe work environment. Undetected and uncorrected safety hazards may cause accidents resulting in serious injury to employees.

There are two major sources of unsafe conditions:

- ▶ **Normal wear and tear of equipment**
Normal wear and tear is the constant process where equipment and areas of facilities deteriorate. Evaluations of equipment and areas can detect hazardous conditions before they cause injury.
- ▶ **Employee actions**
Employee actions can contribute to unsafe conditions in several ways, such as mis-using or abusing equipment, which can be dangerous. Employees may also leave their work area untidy, which creates a dangerous environment.

Hazard Correction

Overview

This section of the CMP IIPP describes the responsibilities and process related to correcting hazards in the workplace.

Hazard Correction Responsibilities

The correction of any identified hazards should be conducted immediately upon detection. Personnel at all levels of employment have responsibilities in hazard correction. All personnel should have an understanding of their role in hazard correction to effectively eliminate identified hazards.

All safety hazards should be reported to the Site Administrator or Site Safety Coordinator.

Site Administrators and Site Safety Coordinators

Upon the identification of an unsafe/unhealthy work condition or practice, the Site Administrators and/or Site Safety Coordinators shall:

- ▶ Identify and control access to a hazard and to prevent further danger to employees and the public
- ▶ Notify the necessary persons responsible for taking required action to correct the hazard
- ▶ Handle conditions involving a serious concealed danger personally until appropriate individuals are notified and corrective action has been taken

Note: A serious concealed danger exists when condition or work practice creates a substantial probability of death, great bodily harm, or serious exposure to an individual and the danger is not readily apparent to an individual who is likely to be exposed

- ▶ Investigate and determine the root cause of any unsafe condition
- ▶ Take temporary precautions until corrections can be made

Employees

All employees are responsible for taking appropriate action to correct unsafe and unhealthy working conditions by immediately notifying appropriate administrative personnel of the conditions.

Controlling Access to Areas Containing Hazards

To prevent danger to employees and the general public, access to any area that contains an immediate hazard or serious concealed danger should be controlled.

Site Administrators responsible for the area of operation where such conditions exist are to inform employees of any serious hazard and should be done as soon as practical.

Only authorized personnel should be allowed access to areas with immediate hazards or serious concealed danger. Areas with such conditions should be properly secured to prevent any unauthorized access. Students should never be allowed access to such areas. Only when the condition has been corrected should access be permitted.

Examples of areas with immediate hazards include, but are not limited to, construction sites, confined spaces, chemical storage areas, transformers, high voltage areas, and electrical utility rooms.

Hazard Correction Follow-Up

Whenever any report of unsafe or unhealthy condition has been made, follow-up is essential to ensure proper corrections are being or have been made.

Once a reported hazard has been corrected, Site Administrators or Site Safety Coordinators responsible for the area should complete a safety follow-up to ensure corrective action has been completed.

Accident Reporting Procedures

Overview

This section of the CMP IIPP explains how employees should report and follow-up on workplace injuries and the requirements for reporting serious and fatal injuries to Cal/OSHA.

Injured Employee Procedure

The following instructions pertain to employees injured in the workplace.

- ▶ Immediately report all injuries, mishaps or near misses to your Supervisor. Dial 911 if injury requires immediate attention
- ▶ Complete the following Worker's Compensation forms:
 - CMP Employee Injury Report
 - California Workers' Compensation Claim Form (DWC 1)
- ▶ Receive medical attention at a Medical Provider Network (MPN) approved medical facility as identified by CMP
- ▶ If you are authorized to return to work, provide a Certificate for Return to Work or Further Treatment, provided by the physician, to the Human Resources Department. If there are any work restrictions, review modified duties with the Site Administrator
- ▶ CMP cooperates with employees and medical providers where reasonable to provide modified duty assignments as part of CMP's return-to-work practices
- ▶ If you are unable to return to work, notify your Site Administrator and provide a copy of an off-work statement from the Physician to the Human Resources Department.

Reports to Cal-OSHA

Serious and fatal injuries are to be immediately reported to Cal-OSHA by the Human Resources Department or designee. Immediately means as soon as practically possible but not longer than 8 hours after CMP becomes aware of the injury.

Serious injuries warranting Cal/OSHA notification include injuries that occur in a place of employment or in connection with any employment which requires inpatient hospitalization for a period in excess of 24 hours for other than medical observation or in which an employee suffers a loss of any member of the body or suffers any serious degree of permanent disfigurement, but does not include any injury or illness or death caused by the commission of a Penal Code violation, except the violation of Section 385 of the Penal Code (high voltage accident in excess of 750 volts), or an accident on a public street or highway.

If CMP can demonstrate that exigent circumstances exist, the time frame for the report may be made no longer than eight (8) hours after the incident.

When making such report, whether by telephone or fax, the Human Resources Department or designee shall include the following information, if available:

- ▶ Time and date of accident
- ▶ School's name, address, and telephone number
- ▶ Name and job title of person reporting the accident
- ▶ Address of site of accident or event
- ▶ Name of person to contact at site of accident
- ▶ Name and address of injured employee(s)
- ▶ Nature of injury
- ▶ Location where injured employee(s) was (were) moved to
- ▶ List and identity of other law enforcement agencies present at the site of accident
- ▶ Description of accident and whether the accident scene or instrumentality has been altered

Cal Osha information:

www.dir.ca.gov/dosh/report-accidnet-or-injury.html

Sacramento District Office:

2424 Arden Way, Ste 165; Sac, CA 95825; Phone: (916) 263-2800

Accident Investigation

Overview

This section of the CMP IIPP explains how Site Administrators and/or the Team should perform an employee accident investigation and identifies the CMP policy for enabling investigations by organizations outside the network.

Internal Accident Investigation

Understanding the root cause of an accident will allow investigators to ~~to~~ measures to prevent similar accidents from recurring. Determining the root cause may be a difficult or arduous task. A diligent investigation will allow management to understand the root cause.

Procedures for investigating employee injuries include:

- ▶ Visiting the accident scene as soon as possible. This allows the investigators to see the scene of the accident before any alterations to the scene can be made. It also allows the investigators to be visible and available to employees in the area
- ▶ Interviewing injured workers and witnesses
- ▶ Examining the workplace for factors associated with the accident. It is essential to inspect the scene of the accident to determine if any hazards are present that may cause future accidents
- ▶ Determining the cause of the accident
- ▶ Taking corrective action to prevent the accident from reoccurring. Initiating appropriate work orders when the incident reveals a maintenance or repair issue that could mitigate any future incidents of the same nature. Immediate and complete corrective action is essential
- ▶ Documenting the findings and corrective actions taken

Outside Agency Investigation

Serious injuries and fatalities may also be investigated by agencies outside of the CMP Network such as, Insurance agencies as well as Cal/OSHA, Fire Departments, Law Enforcement Agencies, and the District Attorney may desire to investigate serious accidents and fatalities.

CMP will cooperate with and assist outside agencies during the course of these investigations.

Training and Instruction

Overview

This section of the CMP IIPP discusses the methods of training and instructing employees on safety issues. Information is presented about formal training, initial job instruction, and safety talks.

Employee Safety Meetings

Employees are required to attend regular meetings which include safety as a topic.

Site safety training shall include but not be limited to:

- ▶ Injury Illness Prevention Plan
- ▶ Blood Borne Pathogen Procedures
- ▶ Safety Operations Plan
- ▶ Hazard Communication
- ▶ Slips, Trips, and Falls/Strains/Ladder Safety

Employee safety meeting dates and sign in sheets are kept at the campus level as part of the Safety Operations Plan.

Initial Job Instruction

When employees move to a new site or role, they are confronted with an entirely new environment and may be subjected to a new set of hazards. Safety training is essential for every employee, regardless as to whether they are a new hire or if they have been transferred from another site or role.

Initial Job Instruction (or Job Position Safety Orientation) refers to the on-the-job training given to new employees or transfers to prepare them to do a specific job. This type of safety training is an initial effort to generally acquaint employees with what they will need to know to perform their new positions safely. This type of training will be performed at the site and shall include topics such as safe use of equipment, general hazards, clean up and housekeeping responsibilities, and appropriate general safety rules.

Pre-Job Safety Instructions for Non-Routine Hazardous Jobs

For non-routine, hazardous jobs such as use of a paper cutter, it is advisable to cover the major job hazards with pre-job safety instructions, which include a specific orientation to the employee for a specific hazardous operation.

Information to be included during this type of training should include but not be limited to:

- ▶ General office/classroom equipment and materials
- ▶ Safety equipment and personal protective equipment requirements
- ▶ Potential exposure to toxic materials
- ▶ Emergency procedures
- ▶ Physical hazards associated with the work area

Safety Talks

Planned Safety Talks

Planned Safety Talks are one of several resource tools for ongoing safety instructions designed to increase awareness of hazards, safe job procedures, and critical safety rules.

Essentially, such talks are short five to ten minute instructional talks between two or more employees.

The subject of the talk is a specific topic like a safety rule or a particular hazard that is in need of emphasis.

Planned safety talks should be used whenever a new substance, process, procedure, or piece of equipment presenting a new hazard is introduced and whenever anyone who oversees others becomes aware of a new or previously unrecognized hazard.

Regular Safety Talks are scheduled at a frequency that best suits the operations of the site or affected employees.

Correctional Safety Talks

When an employee is observed working in an unsafe manner, it is the responsibility of the Site Administrator or designee to correct the employee in a manner appropriate to the facts of the case. Correctional Safety Talks should be conducted in a friendly but firm manner and may include retraining in the applicable safety topic as appropriate

Record-Keeping

Overview

This section of the CMP IIPP describes the requirements for keeping records about safety evaluations, safety training, employee injuries and investigations.

Safety Evaluation Documentation

Safety evaluation documents shall:

- ▶ Be maintained by The Team and/or kept in the Safety Operations Plan at the campus level
- ▶ Include the name of the person(s) conducting the evaluation
- ▶ Include any unsafe conditions or work practices
- ▶ Include corrective actions
- ▶ Be maintained for no less than five years

Employee Injury Reports and Accident Investigation Reports

The following pertains to documents related to employee injuries:

- ▶ The Human Resources Department or designee shall maintain employee injury reports and accident investigation reports.