



Injury and Illness Prevention Program (IIPP)

**September 2008
Revised: January 2016**

**Developed by Cathie Bigger-Smith, ARM, CSP, CPSI with the
Town of Los Gatos Health and Safety Committee**

Town of Los Gatos Injury and Illness Prevention Plan Contents

I. IIPP Elements

- A. Introduction and Scope
- B. Safety and Risk Management Policy
- C. Responsibilities
- D. Compliance
- E. Communication
- F. Hazard Identification, Assessment, and Correction
- G. Training and Instruction
- H. Accident/Exposure and Near-Miss Investigations
- I. Recordkeeping
- J. Cal/OSHA Audit and Citation

I. IIPP Elements

A. Introduction and Scope

The safety and health of our employees and community are a priority for The Town of Los Gatos. As part of our Risk Management Program and Policy, this “**Injury and Illness Prevention Program**” (IIPP) has been developed to provide organization structure and procedures to assure that we have effective programs in place to assure timely identification and mitigation of actual and potential hazards to the safety and health of our staff, residents, visitors and their property. This is essential to our goal of anticipating and correcting accident producing behaviors and conditions to prevent 100% of accidents and injuries in our Town.

The Town employs many people doing many, diverse jobs both inside and outside Town facilities. This requires that our IIPP involve all departments and their staff to identify and manage risk exposures related to each individual’s job requirements. This IIPP covers all employees operating in or from the facilities listed in Section II-A.

This IIPP contains general safety and health program requirements applicable to all Town employees. Where job or department specific risk exists, exposure control plans are maintained in the Town of Los Gatos Safety Manual.

Title 8 of the California Code of Regulations, Section 3203 requires that the Town’s IIPP contain, at a minimum, the following elements which Cal/OSHA and the Department of Labor have determined constitute the minimum required, if fully implemented, for effective injury and illness prevention. These elements are:

- ✓ Responsibility
- ✓ Compliance
- ✓ Communications
- ✓ Hazard Assessment
- ✓ Accident/Exposure Investigation
- ✓ Hazard Correction
- ✓ Training and Instruction
- ✓ Recordkeeping.

NOTE: A copy of the IIPP is located on the Town website at www.losgatosca.gov

B. Safety and Risk Management Policy and Goals

As stated in the Town's Risk Management Policy;

It is the intent of the Town of Los Gatos to provide a safe environment in which its residents, visitors, and employees live and work. The Town is committed to the protection of persons and property from injury, destruction, or loss of use through the systematic identification and control of unnecessary risks, activities, or hazardous conditions.

It is our goal to anticipate and evaluate risk exposures and develop strategies to prevent and/or minimize their impact through avoidance, transfer, control and financing methods. This includes conscientious implementation of this IIPP and other risk management programs to achieve prevention and mitigation of accidents or conditions which may cause injury and illness to our employees, the public and their property.

Additional goals include

- Reduction or elimination of the risk of loss, including the prevention of employee injury and illness.
- Use of "best practice" claims management techniques for losses that do occur and expedite early return to work for injured employees.
- Protection of the Town's budget from catastrophic losses, or an annual accumulation of losses, that would cause financial hardship.

C. Responsibilities

- Safety and health are the responsibility of **every individual** in the Town. Knowledge and use of safe work practices, reporting and correcting unsafe conditions and behaviors are the most effective ways to prevent injuries. All employees are responsible for reporting all injuries and newly identified hazards to supervisors. All employees are authorized and expected to correct unsafe conditions when observed if they can do so without risk to themselves or others.
- The **Town Manager** is ultimately responsible for providing Town Employees with programs, facilities, equipment and training which maximize their ability to protect themselves, other employees, non-employees and their property from injury or damage.
- Overall implementation and oversight of the Town's IIPP and its related programs are the responsibility of the following **IIPP Administrators:**

Human Resources Director
110 E. Main Street, Los Gatos, CA 95030 Phone: 408-354-6829

Assistant Town Manager
110 E. Main Street, Los Gatos, CA 95030 Phone: 408-354-6832

- The administrator(s) shall actively participate in the H&SC and be responsible for, but not limited to
 - Procuring and allocating resources to maintain the program
 - Periodically reviewing the IIPP for effectiveness and relevance
 - Assuring education and monitoring programs are provided to comply with Town safety policies
 - Providing loss experience and related costs to the Executive Team/RMC
 - Interpreting external regulations and recommending appropriate compliance strategies

- Implementation and Oversight of the IIPP in each Department is the responsibility of each Department Director as the IIPP Department Administrators for their Department. These include the following Department Directors:

Community Development

110 E. Main Street, Los Gatos, CA 95030
Phone: 408-354-6872

Library

110 E. Main Street, Los Gatos, CA 95030
Phone: 408-354-6891

Parks & Public Work (PPW)

41 Miles Avenue, Los Gatos, CA 95030
Phone: 408-399-5770

Police

110 E. Main Street, Los Gatos, CA 95030
Phone: 408-354-5257

Town Administration

(includes Town Manager, Finance, Clerk, Attorney and MIS)
110 E. Main Street, Los Gatos, CA 95030
Phone: 408-354-6834

- **Managers and supervisors** are responsible for implementation and management of the IIPP in their work areas, notifying the administrators of new operations and related safety exposures, providing information, personal protection and answering worker questions about the IIPP. Managers and supervisors must consistently enforce safe work practices as defined in our policies and procedures. Managers and supervisors must evaluate all reports of unsafe acts and conditions reported by employees and provide feedback regarding the action(s) taken. **Employee reports of hazards must be received with no fear of retribution or negative consequences.**

Managers and supervisors must also provide a forum for the H&SC to provide relevant safety and health information, training, and serve as liaison between employees and the H&SC.

Note: California AB 2249 –California Corporate Criminal Liability Act criminalizes a corporation or manager for knowingly failing to warn

employees about concealed danger within 15 days of its discovery. The regulation applies only if all of the following tests are met:

- ✓ **The hazard causes serious injury or illness**
 - ✓ **The hazard, by its nature, is concealed from the injured person**
 - ✓ **The manager was aware or SHOULD HAVE been aware of the hazard and its severity**
-
- **The Los Gatos Safety Committee (H&SC)** support the IIPP Administrators by executing its functions and responsibilities as defined in the H&SC Charter

 - **Los Gatos Town Safety Officer** provides support for the IIPP Administrators, H&SC and RMC by providing data and analysis, technical risk management support at meetings, and assistance with program development as requested.

D. Compliance

All workers, including managers and supervisors, are responsible for complying with safe and healthful work practices. Our system of ensuring that all workers comply with these practices includes:

1. Educating our workers of the provisions of our safety and health policies including provisions of this IIPP.
2. Providing training as necessary to workers to perform their jobs safely based on job hazard analysis.
3. Enforcing safety policies and procedures consistent with existing policies, procedures and MOU's.
4. Providing remedial training or disciplinary action as determined by Department Directors or their designate.
5. Remediating or responding with intended or actual action to hazardous conditions/acts reported by employees within one working day unless there is imminent danger to people or property. In this case, action will be immediate and people will be removed from the hazardous area.
6. Use of Town disciplinary policy to address violation of safe work practices or exhibiting unsafe behavior.

Town compliance with the provisions of the IIPP will be monitored by the IIPP Administrator(s) and the H&SC, in accordance with its charter, and RMC, resulting in an annual review and update of the IIPP documents.

E. Communications

Our IIPP will be effective in preventing injury and illness only if there is clear and open communications among all. Communications must occur through multiple channels and mechanisms to reach all employees consistently. Therefore, the Town of Los Gatos has created a variety of mechanisms whereby hazards are identified, reported, evaluated and mitigated, as outlined in this Injury and Illness Prevention Program.

All managers and supervisors are responsible for communicating with all workers about occupational safety and health in a form easily understood by all workers. Communications may require facilitation through translators or other means to assure communication is clear and fully understood.

Our communication system requires that all workers inform their managers and supervisors about workplace hazards without fear of reprisal.

- Workers are encouraged to submit safety concerns to the H&SC through their department representative directly in person, by email, phone, or in writing. If an employee is more comfortable reporting anonymously employees may use the **intranet-based safety concerns report** (<http://www.losgatosca.gov/2237/Report-a-Safety-Concern>) to make safety improvement suggestions or report unsafe acts or conditions. For non-urgent reports, the H&SC will recommend appropriate action and response.
- If the hazardous condition or activity presents an imminent danger of injury or an accident, the situation must be reported directly to the employee's supervisor, manager, Department Head, safety committee member, or an IIPP administrator for immediate attention.
- All reports of hazardous conditions or behavior will be reviewed by the H&SC at each meeting and feedback provided if possible through general posting, H&SC Meeting Minutes or method requested by the person reporting the issue. A record of corrective action taken will be maintained in the offices of the department where the hazardous condition existed. Those remedies involving a building/ equipment modification or maintenance issues will be documented and maintained in PPW as part of the WO system.
- Non-employee related hazard/safety reporting such as conditions called in by the public, will be recorded and resolved by the Customer Service Center through contact with the appropriate department.

Our communication system includes the following to assure effective safety communications with our employees:

1. New worker orientation and discussion of safety and health policies and procedures.
2. Review of our IIPP with new employees.
3. Safety training programs as required to address actual and potential employee safety exposures or conveying general injury prevention information.
4. Department safety/operations meetings.
5. Tailgate meetings for PPW employees
6. Posted or distributed safety information including OSHA 300 Logs.
7. Feedback from job/task safety observations.
8. Lessons learned from accident investigations and facility/equipment inspections will be shared with employees.
9. H&SC Committee Meeting minutes.
10. Employee safety suggestions and hazard reports.
11. Employee injury trend data including recordable injury rates, lost day rates and severity rates.

F. Hazard Identification, Assessment, and Correction

1. Hazard Identification and Assessment

Hazard Identification and Assessment is an ongoing process and fundamental to the effectiveness of the IIPP. Scheduled formal and unscheduled informal inspections of facilities along with job hazard analysis form the basis for the timely identification of new or previously unrecognized hazards in and around Town facilities.

Participants in the inspection program should be competent in hazard identification or receive training to develop/enhance these skills. Findings from the initial Hazard Identification Inspection, and injury and accident trends identified from analysis of accident logs will be used to identify exposures and focus inspections.

Inspections will be scheduled and completed at least annually. The Health and Safety Committee (H&SC) will develop and distribute a revised schedule and scope annually for standard recurrent facility inspections with deadlines for completion. The committee will assure inspectors have received appropriate training and direction.

Additional inspections are required when any of the following occur

- a. When new substances, processes, procedures or equipment which present potential new hazards are introduced into our workplace;
- b. When new, previously unidentified hazards are recognized;
- c. When occupational injuries and illnesses occur, especially those that are recurrent types; and
- d. Whenever workplace conditions warrant an inspection.

Scheduled periodic inspections include the completion of site specific Hazard Identification worksheet or checklists.

2. Hazard Correction

Unsafe or unhealthy work conditions; practices or procedures shall be corrected in a timely manner based on the severity of the hazards. Hazards shall be corrected according to the following procedures:

- a. When observed or discovered; and
- b. When a problem area is identified which cannot be immediately mitigated without endangering workers or property, all people exposed to the hazard are to be removed from the area except those needed to correct the problem. Those remaining in the area must be properly trained and be provided with appropriate protection.
- c. When a potential hazard is identified that cannot be corrected immediately, but may not present an imminent threat to injury or illness, all affected employees members of the public who may be exposed, must be advised of the hazard through signs, barriers, notices, etc. A work order (WO) will be submitted to PPW or other appropriate department. PPW (or other) will determine a target date and plan to correct the hazardous condition. PPW (or other) will inform the originator of the WO of the status of the plan. Completion (correction of the hazardous condition) shall be documented and provided to the manager for the area and the H&SC. Corrective action will be recorded in the designated section of the inspection form.
- d. The H&SC will review findings of safety inspections and resulting mitigation activity at its next scheduled meeting following the inspection.

G. Training and Instruction

1. Who Must be Trained?

All workers, including managers and supervisors, shall have training and instruction on general and job-specific safety and health practices. Training and instruction is provided:

- a. When the IIPP is first established;
- b. To all new workers, except for construction workers who are provided training through a construction industry occupational safety and health training program approved by Cal/OSHA;
- c. To all workers given new job assignments for which training has not previously provided;
- d. Whenever new substances, processes, procedures or equipment are introduced to the workplace and represent a new hazard;
- e. Whenever the employer is made aware of a new or previously unrecognized hazard;
- f. To supervisors to familiarize them with the safety and health hazards to which workers under their immediate direction and control may be exposed; and
- g. To all workers with respect to hazards specific to each employee's job assignment.

2. Training Topics and Content

Training needs will be determined in each department based on job duties and exposure and as described above. The Training Matrix identifies topics by department and the frequency with which it must be provided. General workplace safety and health practices include, but are not limited to, the following:

- a. Explanation of the purpose, content and specific requirements of the Town's IIPP including measures for reporting unsafe conditions or activity, work practices, and injuries.
- b. The Town's Safety and Risk Management Policy.
- c. Emergency preparation, response and fire prevention.
- d. Provisions for medical services and first aid including emergency procedures.
- e. Prevention of musculoskeletal disorders, including proper lifting techniques.
- f. Proper housekeeping, such as keeping stairways, aisles, and access to alarms and fire extinguishers clear, work areas neat and orderly, and promptly cleaning up spills.
- g. Prohibiting horseplay, scuffling, or other acts that tends to adversely influence safety.
- h. Proper storage to prevent stacking goods in an unstable manner and storing goods against doors, exits, fire extinguishing equipment and electrical panels.
- i. Proper reporting of hazards and accidents to supervisors.
- j. Hazard communication, including worker awareness of potential chemical hazards, and
- k. Proper storage and handling of toxic and hazardous substances including prohibiting eating or storing food and beverages in areas where they can become contaminated.

- l. Sanitation considerations including availability of toilet, hand washing, and drinking water facilities.
- m. Specific Cal/OSHA-required training for job related exposures such as, but not limited to, personal protective equipment, heat stress, hazardous energy control, and tool and machinery.

3. Delivery of Training

- a. The IIPP Site Administrators will identify and assure that all employees receive general training required by the IIPP as described above.
- b. Department managers and supervisors will identify and provide initial and recurrent job specific safety training as required
- c. Refresher and motivational training will occur as part of supervisory and other training. This training will be identified and arranged by the IIPP Administrator and Department Management.
- d. Training records will be maintained through the Town's Learning Management System.

H . Accident/Exposure and Near-Miss Investigations

It is the Town of Los Gatos' policy to report and investigate all employee, non employee, property and vehicle accidents, exposures to infectious, toxic or other hazardous substances, and near misses. It is essential for the prevention of possible future recurrence, to determine the root cause(s) of these incidents. The "lessons learned" from these investigations may result in modifications to processes, procedures, and training that may enhance the safety of the job related activity.

- 1. Responsibility
Accidents and exposures are investigated by the supervisor in consultation with the IIPP Site Administrator. Depending on the severity of the incident, a team of investigators, including third party specialists may be involved. Accident investigation reports are reviewed quarterly by the Town Safety Committee to determine if additional action is required.
- 2. Training
All Managers and supervisors must be trained in accident investigation techniques and Town-specific procedures.
- 2. Minimum procedures for investigating workplace accidents and hazardous substance exposures include:
 - a. Interviewing injured workers and witnesses;
 - b. Examining the workplace for factors associated with the accident/exposure;
 - c. Determining the cause of the accident/exposure;
 - d. Taking corrective actions to prevent the accident/exposure from reoccurring; and
 - e. Recording the findings and actions taken.

I. Recordkeeping

In accordance with CCR 3203, The Town of Los Gatos is categorized as Category 3 employer. This identifies the Town as “a local governmental entity (county, Town, district, or and any public or quasi-public corporation or public agency)”. The Town, except for those departments which are designated “high hazard” (Category 1, i.e. Service Center and related Operations) are not required to keep written records of the steps taken to implement and maintain our IIP Program. However, to better maintain and monitor the effectiveness of our IIPP, Risk Management Program and to fully participate in any Cal/OSHA audits requiring proof of safe work practices, the Town will keep the following documentation.

	Document Title	Location Kept	Retention Period
REQUIRED	Employee Injury Reports	Human Resources	Termination of employment
	Training Matrix	HR or Department	3 year
	Job Safety Training Records	HR or Department	3 year
	Log of Work Related Injury & Illness (Cal/OSHA 300, 301, Summary)	HR, post annually February 1 to April 30	5 years
	Accident Investigation Reports	Department/Safety Committee	TBD (no min requirement)
	Employer's Report of Injury (DSL5020)	Human Resources	1-5 years
	Job Hazard Analysis	Department	Indefinite
	Facility Hazard Inspections	Department	3 years
	H&SC Meeting Minutes	Safety Committee/ IIPP Administrator	1 year (or until all outstanding issues resolved)
	Workplace Hazard Correction Records	Department	1 year
	Cal/OSHA Citations	Department where Generated	See J Below
OPTIONAL	Non Employee Injury Reports and Investigations	Human Resources	Per ABAG Direction or Town Policy
	Property Damage Reports and Investigations	Town Attorney	Per ABAG Direction or Town Policy
	Vehicle Accident Reports and Investigations	Town Attorney	Per ABAG Direction or Town Policy
	Photos of Potential Hazards and risk controls	Town Attorney	1 Yr post correction or Town Policy
	Public Notification of Corrective Action	Town Web Site	Town Policy
	Notification to non employee to correct hazard	Town Attorney	Town Policy

J. Cal/OSHA Audit and Citations

In the case of an audit by CAL OSHA or representatives of the Director of the California Department of Health services:

1. Post any Cal/OSHA citations at or near the work area involved. Each citation must remain posted until the violation has been corrected, or for three working days, whichever is longer. Post all abatement verification documents and/or tags in place of the citation when hazards have been abated.
2. Correct cited violations by the deadline set in the Cal/OSHA citation and submit required abatement verification documentation.