



Introduction

The prevention of occupational injuries and illnesses is of paramount importance at Western University of Health Sciences (WesternU). WesternU will maintain a health and safety program conforming to the best practices of organizations in our industry. Our objective is a health and safety program that will reduce injuries and illnesses and surpass the best experience of other operations similar to ours.

Our Injury and Illness Prevention Program (IIPP) will emphasize injury and illness prevention on the part of both management and employees. WesternU promotes cooperation in all health and safety matters, not only between management and employees, but also between each employee and his or her co-workers. Only through a cooperative effort can an effective health and safety program, in the best interest of all, be established and preserved.

The following document details the steps WesternU is taking to accomplish a stellar Injury and Illness Prevention Program.



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1. Purpose and Scope:

Western University of Health Sciences (WesternU) is committed to maintaining a safe and healthful environment for its employees, students, and guests. In accordance with the Cal/OSHA requirement (California Code of Regulation, Title 8, Section 3203), WesternU has adopted an Injury and Illness Prevention Program (IIPP), which includes specific requirements for program responsibility, compliance, communications, hazard assessment, accident/exposure investigations, hazard correction, training, and recordkeeping. The IIPP:

WesternU, Pomona:

- Identifies the Person(s) responsible for implementation and maintenance of the program.
- Provides procedures for identifying and evaluating hazards and unsafe conditions
- Communicates with employees regarding health and safety matters
- Develops work practices to ensure compliance strategies
- Provides employee training programs
- Maintains proper documentation/recordkeeping for health and safety programs
- Develops procedures for correcting hazards and unsafe conditions

2. Responsibilities:

The University Chief Operating Officer (COO) is ultimately responsible for the effective implementation of the University's Environmental Health & Safety (EH&S) programs, including the Injury and Illness Prevention Program (IIPP) at all facilities under WesternU control. General policies, which govern the activities and responsibilities of the EH&S program, are established under the authority of the COO.

2.1 Program Administrator

As designated by the COO, the individual with responsibility for implementing the IIPP is the Executive Director of University Compliance, hereafter referred to as the Program Administrator. The Program Administrator has the authority to implement all provisions of this program. All university employees are responsible for supporting the program and for working safely and maintaining a safe and healthful work environment.

All managers, supervisors and lead personnel are responsible for implementing and maintaining the IIPP in their work areas and for answering worker questions about the Program.

2.2 Environmental Health & Safety (EH&S)

- Provides consultation to all levels of WesternU employees regarding program compliance on issues such as hazard identification and evaluation; recommend

procedures for correcting unsafe conditions; determining appropriate systems for communicating with employees; providing information for regularly scheduled safety meetings and employees training programs; discuss/recommend compliance strategies, and recordkeeping requirements to ensure overall compliance

- Assists in the development of operating unit specific templates to assist in implementing an effective IIPP specific to a given area
- Provides centralized monitoring of campus-wide activities in the areas of environmental compliance, biological safety, fire safety, chemical hygiene, emergency preparedness, hazard communication, hazard identification, hazardous materials management, industrial hygiene, occupational safety, sanitation, and safety education and training

2.3 Department Heads/Deans/Directors

These individuals have the primary responsibility for ensuring that the program is implemented and maintained in their particular areas of responsibility. They must be knowledgeable of the program contents and requirements to ensure compliance with the program. To accomplish this, they shall:

- Ensure individuals under their management have the authority to implement appropriate health and safety procedures, practices and programs
- Have adequate funding for health and safety programs, practices, and equipment
- Coordinate with EH&S to address any safety concerns

2.4 Principal investigators (PI)/supervisors/managers/administrators

Supervisors are key figures in WesternU's IIPP implementation. It is important that they establish and maintain safe and healthful working conditions, and correct unsafe behaviors and conditions in a timely manner. They should:

- Make sure hazardous conditions are corrected in a timely manner
- Report and investigate all incidents and accidents within their areas of responsibilities to determine causes and take corrective/preventive action
- Ensure that health and safety practices are consistent throughout the work area and that specific training is provided and documented
- Educate their staff on expected general, and area specific, health and safety practices; documents the training and forwards a copy of the documentation to EH&S for record keeping
- Encourage employees to report safety concerns without fear of reprisal
- Make sure Standard Operating Procedures (SOPs) are created for high risk activities

2.5 Employee/Students/Volunteers Responsibilities

The success of WesternU's IIPP depends on the action of all members of the campus community. Therefore, it is expected that Employees/Students/Volunteers:

- Perform their assigned job functions in a safe and healthful manner
- Complete all EH&S required generic and operating unit-specific training
- Participate in all Safety meetings for their work group
- Follow established safe practices in the laboratory, classroom and/or workplace
- Use engineering controls and personal protective equipment when required
- Adhere to all health and safety-related signs, posters, warning signals, and directions
- Become familiar with building emergency evacuation plans and assembly areas
- Promptly report work-related injuries or illnesses, incidents (e.g., spills, “near misses”) potential hazards, and unsafe work practices to EH&S
- Cooperate and assist as necessary in accident and incident investigations

2.6 Third Parties (i.e. Vendors, Consultants, Contractors, etc.)

Third parties are responsible for complying with EH&S policies, procedures and programs that apply to their activities at WesternU. These requirements may include completing WesternU safety training.

2.7 Building Safety Coordinators (BSC)

BSC have the primary responsibility for evacuating buildings in the event of a major emergency. In the event of an evacuation, BSC will establish control at their designated assembly area and begin the process of employee and guest accountability. The BSC will have good working knowledge of evacuation procedures and the University Emergency Response Plan. This will be accomplished through quarterly training sessions, conducted by EH&S and Campus Security.

2.8 Risk Management

To help support the university’s IIPP, Risk Management is responsible for:

- Investigating all reported injuries and losses to determine the cause so as to prevent recurrence
- Coordinating, reporting, managing and maintaining records of non-occupational liability, and submit insurance claims when indicated
- Providing risk management information, education, and services to university departments

3. Compliance

WesternU strives to ensure that all employees comply with safe and healthy work practices. Managers, supervisors and responsible persons in the work unit, are responsible for establishing and maintaining sound health and safety practices. To ensure compliance, the following procedures will be implemented by managers and supervisors:

- Inform all employees of the provisions of this IIPP
- Evaluate the performance of their job duties in a manner that demonstrates awareness of the requirements to ensure the health and safety of the work area
- Recognize employees for following safe and healthful work practices
- Encourage employees to participate in training, and retraining, as necessary or required
- Take disciplinary action, as appropriate with employees for failure to follow safe and healthful work practices
- Participate in completing annual Hazard Assessments & Corrections or surveys, if indicated
- Report a safety concern to EH&S

3.1 Disciplinary Action

All employees, including all levels of management, will be held accountable for obeying site health and safety rules. Allegations involving individuals deemed to have violated health and safety rules will be referred to Human Resources for review. If indicated, disciplinary action will be instituted in accordance with WesternU's Human Resources policies and procedures.

Visitors, including third parties, who violate health and safety rules and procedures, may be removed from the site and/or campus.

4. Communication

WesternU communicates in a form that is readily understandable and accessible to all employees on matters pertaining to occupational health and safety. Methods used to communicate include:

- New employee orientation, including a discussion of health and safety policies and procedures.
- Review of our IIPP
- Training Programs
- Regularly scheduled safety committee meetings
- Participation in research compliance panels
- Anonymous and confidential hazard reporting
- Posted and distributed health and safety information
- A system for workers to anonymously inform management about workplace hazards

WesternU employees should not suffer any type of reprimand, discipline, or punishment as a result of reporting a safety hazard or concern. Management encourages employees' involvement and devises appropriate recognition for outstanding employee participation.

5. Hazard Identification and Evaluation

WesternU has procedures for identifying and evaluating workplace hazards, such as chemical inventory of laboratories, and scheduled periodic inspections to identify unsafe conditions and work practices. EH&S and University Compliance conducts periodic Research Lab and Building Safety Surveys, including routine radiation safety monitoring and biological safety inspections.

Representatives from each work area are asked to complete annual Hazard Assessments for their work unit and submit the report to EH&S for review. Results of the hazard identification and hazard assessment are used to determine the types of health and safety practices needed. This information is relayed to the manager of the work area to implement and maintain.

6. Accident Reporting/Investigation

If an employee sustains a work-related injury, the employee or a co-worker will immediately notify the supervisor and the Office of Human Resources of the incident. Dial 911 if prompt medical treatment is needed. The employee or their supervisor will complete [WesternU Incident Report](#). If the date and time of the injury or illness cannot be determined, such as an injury caused by cumulative or repeated stress, the date of the last time the employee worked should be entered on the form.

Any person who observes or causes damage to property or equipment will immediately report such damage to a supervisor.

6.1 Injury to Visitors

Injuries sustained by visitors while on campus or at a facility that WesternU controls must be reported to the Director of Risk Management via completing a [WesternU Incident Report](#). Injured visitors will be immediately provided medical treatment, if necessary. The causes of injuries to visitors will be investigated through the same processes as for an employee accident investigation.

6.2 Near-Miss Incidents

“Close calls” or “near-misses” must be reported to EH&S. This information can identify unhealthy or unsafe procedures or conditions that would require immediate corrective action to eliminate the hazard and avoid possible injury in the future.

6.3 Investigations

As part of completing the [WesternU Incident Report](#), the employee and supervisor should work together to determine the cause of the incident and to ensure that appropriate follow-up, hazard communication, and hazard correction has occurred.

EH&S and Risk Management review the WesternU Incident Reports. Incident Report investigations are documented and filed with the appropriate department, e.g., EH&S, Risk Management and Human Resources.

7. Hazard Correction

Unsafe or unhealthful work conditions, practices, or procedures are corrected in a timely manner based on the severity of the hazards and available university funds. For serious hazards that pose an immediate threat to life, health, or safety, immediate action will be taken to mitigate the

hazard. The Supervisor/Principal Investigator, department head(s), EH&S, Risk Management, and all affected employees will be notified of the hazard. If the hazard cannot be immediately abated, all personnel will be removed from the affected area. Access to the area will be controlled until the safety of personnel can be assured.

8. Training and Instruction

Training is provided to each employee, including managers and supervisors, with regard to general safety procedures and to any hazards specific to an employee's job.

8.1 Training and instruction will be provided:

- When new employees are hired
- When existing employees are reassigned to jobs for which they have not received prior safety training
- Whenever new substances, procedures, processes, equipment, or facilities are introduced and represent a new hazard
- When WesternU is aware of a new or previously unrecognized hazard
- To supervisors concerning all hazards to which employees under their direct supervision may be exposed
- To employees concerning hazards specific to their job assignment(s)
- On a regular basis to reinforce existing health and safety procedures

8.2 General job health and safety training will include:

- Implementation and maintenance of this IIPP
- Emergency response and fire prevention plan
- Provisions for medical services and/or first aid, including emergency procedures
- Prevention of musculoskeletal disorders, including proper lifting techniques
- Proper housekeeping, such as keeping stairways and aisles clear, work areas neat and orderly, and promptly cleaning up spills
- Prohibiting horseplay, scuffling, or other acts that tend to adversely influence safety
- Proper storage to prevent stacking goods in an unstable manner and storing goods against doors, exits, fire extinguishing equipment, and electrical panels
- The proper reporting of hazards and accidents to supervisors
- Hazard communication, including worker awareness of potential chemical hazards and proper labeling of containers
- Proper storage and handling of toxic and hazardous substances, including prohibiting eating or storing food and beverages in areas where they can become contaminated

In addition, EH&S will provide specific instructions and training to all workers regarding the hazards that are unique to their job assignments, including wearing and caring for PPE, if required for the job.

Training records can be directly requested from the department by EH&S.

9. Recordkeeping

The University has taken the following steps to implement and maintain the IIPP:

- Records of hazard assessment inspections, including the person(s) conducting the inspection, the unsafe conditions and work practices that have been identified and the action taken to correct the identified unsafe conditions and work practices, are recorded on a hazard assessment and correction form. The training documentation will be maintained by EH&S.
- Records of health and safety training for each employee will include employee name or other identifiers, training dates, type(s) of training, and information about the training providers. The training documentation will be maintained by EH&S.

EH&S will maintain all records related to this Plan in accordance with state and/or federal law. All records are available for employee and regulatory agency review upon request. Examples of reports maintained by EH&S include, but are not limited to:

- **Accident investigation records.** EH&S will maintain comprehensive accident/injury records and will maintain records of all accident investigation reports and data for five (5) years.
- **Illness and injury reports.** EH&S maintains the OSHA 300 Log for the University. This log is kept for five (5) years.
- **Inspection records.** All inspection records and forms will be kept for one (1) year by EH&S.
- **Safety meeting records.** Each safety meeting will be documented with an attendee sign-in sheet and a meeting agenda that includes the supervisor's name, date of meeting, and subject(s) covered. This documentation will be maintained for at least one (1) year. EH&S is responsible for maintaining these records.