



## **Injury and Illness Prevention Program**

**Adopted  
May 27, 2008**

## INJURY AND ILLNESS PREVENTION PROGRAM APPROVALS

This Injury and Illness Prevention Program (IIPP) has been prepared for the following location:

*CITY OF TURLOCK*  
*156 SOUTH BROADWAY*  
*TURLOCK, CA 95380*

This IIPP has been prepared, reviewed, and approved by the following personnel:

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*MICHAEL COOKE*  
Regulatory Affairs Manager

Date

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*JOHN FRENCH*  
Assistant City Manager, Program Administrator

Date

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*TIM KERR*  
City Manager

Date



## I. PURPOSE

This Injury and Illness Prevention Program (IIPP) has been updated as part of the City of Turlock's (the "City's") health and safety program in an effort to provide our employees with a safe and healthful working environment. The purpose of this program is to ensure that we identify, evaluate, and correct occupational hazards or unsafe acts in the workplace before they result in employee illness or injury.

This procedure serves as the City's written program for compliance with the requirements of an IIPP as contained in Title 8 of the California Code of Regulations, Section 3203 (8 CCR 3203).

## II. HEALTH AND SAFETY POLICY STATEMENT

At the City of Turlock, employees are our most important asset and their well being our greatest responsibility. The health and safety of every employee, as well as the public, must be primary in every business decision and plan.

A good safety record is evidence of effective management. The objectives of our health and safety programs are both humanitarian and economic. It is our policy to do everything reasonable to protect our employees, property, and the public from the results of accidents. Everyone in this organization, especially City management, is expected to actively support and participate in the health and safety program and accept the premise that "accidents can be prevented."

## III. RESPONSIBILITIES

In order for this or any safety program to be successful, roles and responsibilities need to be assigned to the most appropriate personnel. It is our belief that City management is ultimately accountable for implementing safety practices and procedures at the City. The following key personnel and their duties have been designated as follows:

City Manager: *Tim Kerr*  
Program Administrator: *John French, Assistant City Manager*

### ***City Manager***

The City Manager has the authority and responsibility for the overall development and implementation of the IIPP. He is also responsible for providing the support and resources necessary to maintain safe and healthful working conditions at City operations. This responsibility includes:

- Providing management support and resources necessary for health and safety programs



- Empowering the Program Administrator with the authority to implement the IIPP
- Evaluating the effectiveness of the City's health and safety programs
- Monitoring the performance of health and safety policies and procedures
- Ensuring that the IIPP and other health and safety programs are updated on an annual basis or more frequently if warranted
- Ensuring compliance with local, state, and federal health and safety regulations, as well as the City's own policies and procedures

### ***Program Administrator***

The Program Administrator will work in conjunction with the City Manager, Service Area Directors and managers/supervisors to administer the IIPP and other health and safety programs. This may include, but is not necessarily limited to:

- Advising senior management on safety and health policy issues
- Maintaining and distributing current information on local, state and federal safety and health regulations
- Acting as liaison with other agencies
- Planning, organizing and coordinating safety training
- Preparing and distributing City policies and procedures on workplace safety and health issues
- Reviewing injury and illness trends
- Acting as Chairman of the Central Safety Committee
- Implementing a safety training plan
- Investigating employee's safety concerns
- Implementing a safety communication plan
- Monitoring the IIPP anonymous safety reporting line (209 668-5542, ext. 1125)

### ***Service Area Directors***

Service Area Directors will be responsible for periodically reviewing the health and safety needs of employees under their direction. In addition, the Service Area Directors are responsible for:

- Reporting unsafe equipment or operations to the Program Administrator and implementing corrective measures
- Developing his/her own knowledge and skill in safety
- Ensuring that periodic safety inspections are conducted on equipment and vehicles
- Making sure that an adequate supply of personal protective equipment is available
- Requiring that the Program Administrator be apprised of developments on the job that could impact personnel health and safety
- Demonstrating personal belief that safety is critically important to him/her and to the City



### ***Managers and Supervisors***

Each manager and supervisor will serve as the initial contact for their employees' health and safety-related questions. If an issue arises that cannot be adequately addressed by the supervisor, she/he will contact the Service Area Director as soon as practical to resolve the issue. The supervisor is also responsible for ensuring that all work-related injuries or illnesses are reported to the Service Area Director as soon as possible, with no delay exceeding 24 hours.

### ***Employees***

Employees are responsible for immediately reporting unsafe conditions in the workplace to their supervisors so that potentially hazardous situations can be addressed and in a timely fashion. Employees must also immediately notify their supervisors if a work-related injury or illness occurs. Employees are encouraged to communicate with their supervisors whenever they have a health and safety question, concern, or suggestion. Employees are also responsible for:

- Routinely inspecting equipment, tools, vehicles, and operations and reporting any damage, defects, or safety hazards to the area supervisor or the IIPP anonymous safety reporting line (209 668-5542, ext. 1125);
- Identifying and reporting unsafe acts or working conditions to his/her supervisor
- Immediately reporting all accidents, injuries, and other incidents to his/her supervisor
- Performing all work in a safe, professional, and responsible manner
- Comply with Department and City safety policies and directives
- Correctly using and maintaining all equipment, tools, vehicles, respirators, and personal protective equipment

### ***Central Safety Committee***

- Developing a code of safe practices and inspection guidelines
- The Central Safety Committee is established to meet on a monthly basis
- The Committee is chaired by the Program Administrator and made up of a group of City employees from diverse backgrounds and work classifications
- The Committee prepares and makes available to the affected employees, written records of the safety and health issues discussed at the committee meetings and, maintained for review upon request. The committee meeting records shall be maintained for at least one (1) year
- Reviews results of the periodic, scheduled worksite inspections
- Reviews investigations of occupational accidents and causes of incidents resulting in occupational injury, occupational illness, or exposure to hazardous substances and,



where appropriate, submits suggestions to management for the prevention of future incidents

- Reviews investigations of alleged hazardous conditions brought to the attention of any committee member. When determined necessary by the committee, the committee may conduct its own inspection and investigation to assist in remedial solutions
- Submits recommendations to assist in the evaluation of employee safety suggestions
- Arranging safety and health inspections and follow-up to ensure that necessary corrective action is completed
- Makes recommendations regarding safety
- Administers the safety awards and recognition program
- Disseminates safety information back to the work areas

#### **IV. COMPLIANCE**

All employees of the City are expected to comply with this program, including all rules, policies, and procedures concerning health and safety in the workplace. Positive reinforcement and recognition of safety-conscious employees will be an integral part of the strategy to promote compliance. The City Manager or Program Administrator will reinforce positive safety related behavior and take corrective action to address unsafe actions. Health and safety performance will be reviewed as a part of each employee's and each supervisor's performance evaluation.

#### **V. COMMUNICATION**

The City of Turlock recognizes that open, two way communication between management and staff on health and safety issues is essential to an injury free, productive workplace. The following system of communication is designed to facilitate a continuous flow of safety and health information between management and staff in a form that is readily understandable.

1. The new employee orientation will include review of Turlock's IIPP and a discussion of policy and procedures that the employee is expected to follow.
2. The City of Turlock will post and or distribute written safety notifications. Employees should check City of Turlock bulletin boards regularly for such postings. Questions about the meaning or implementation of this information should be directed to an employee's supervisor.
3. Other methods of communication pertinent to health and safety information include electronic mail and the City's Central Safety Committee. The Central Safety Committee is made up of a cross section of employees from varied work areas. They meet on a monthly basis to review accidents, plan safety activities,



review policy, evaluate training materials and recommend awards. The Program Administrator serves as the Chairperson of this committee.

4. All employees are encouraged to inform their supervisor, the Program Administrator or designee of any matter which they perceive to be a workplace hazard and/or a potential workplace hazard. Employees are also encouraged to make safety suggestions and safety training suggestions. Employees are encouraged to call (209) 668-5542, ext. 1125 if they would be more comfortable remaining anonymous when reporting safety concerns.
5. No employee shall be retaliated against for reporting hazards or potential hazards, or for making suggestions related to safety.
6. All suggestions will be reviewed by the Program Administrator or designee, who will initiate an investigation of each report of a hazard, potential hazard or safety suggestions in accordance with City procedures for hazard control.
7. Any directives issued as a result of the investigation shall be distributed to all employees affected by the hazard, or shall be posted on appropriate bulletin boards.
8. Employees are encouraged to communicate directly with managers and supervisors in verbal or written form about hazardous health and safety conditions.

## **VI. HAZARD IDENTIFICATION, EVALUATION, AND INSPECTIONS**

Safety inspection practices and job specific safety check-lists have been developed at City departments where employees use and operate potentially dangerous machinery, and handle hazardous substances. Material Safety Data Sheets (MSDS) are maintained and all required labeling and handling practices are followed for hazardous substances.

Hazard control is the heart of an effective IIPP Program. The City of Turlock's hazard control procedure is to identify hazards that exist or develop in the workplace, describe how to correct those hazards, and initiate steps to prevent their recurrence.

Quarterly, the Central Safety Committee will review workplace injury reports and inspection reports.

The Program Administrator will confirm that periodic inspections are conducted to verify compliance and to identify previously unrecognized hazards. Each supervisor is responsible for promptly reporting to their Service Area Director or to the Program Administrator or designee whenever a new substance (such as a chemical or solvent), new work procedure or technique, and/or new equipment are introduced which may pose a safety risk. Based upon the information, the Service Area Manager, with the assistance



of the Central Safety Committee will develop a safety inspection checklist and safety guidelines for the new equipment, procedure, or substance.

Examples of when a safety inspection checklist and safe practices should be developed include:

- Whenever the Service Area Manager is made aware of a new or previously unrecognized hazard
- When an occupational illness, or occupational injury, or near-miss accident occurs

Safety Inspections will be documented and forwarded to the Program Administrator regularly. If an unsafe work condition or work practice is identified, the situation will be remedied by the Service Area Manager or Program Administrator. If the situation cannot be corrected by either party, the City Manager will be contacted to resolve the issue.

## **VII. ACCIDENTS**

The majority of accidents do not cause injury/or illness, yet result in property damage and/or lost productivity. Such mishaps usually indicate an unsafe act, faulty procedure or hidden hazard. Investigations of these occurrences are conducted at the discretion of the City Manager, or Program Administrator.

The occurrence of an occupational injury and/or illness precipitates an Employer's Report of Injury. This report is completed by the injured employee's supervisor, and a copy of the report is to be sent to the Program Administrator or designee within 24 hours of the occurrence. Upon receipt, the Program Administrator reports fatalities and serious injuries or illness immediately by phone or FAX to the nearest office of the Division of Occupational Safety and Health (CCR Title 8, Section 342).

## **VIII. INVESTIGATIONS**

The purpose of an accident investigation is to find the cause of an accident and prevent further occurrences - not to assign blame.

A thorough and properly completed accident investigation is necessary to obtain facts. The investigation should focus on causes and hazards. Analysis of what happened and why it happened is aimed at determining how it can be prevented in the future.

Service Area Managers and supervisors will be responsible for investigating occupational illnesses and injuries to facilitate identification and abatement of hazards and unsafe acts. It is important that the investigation begin as soon as possible after the event. Where appropriate, the investigation may proceed as follows:





1. A visit will be made to the site of the occurrence as soon as possible after the injury or incident occurs.
2. The injured or affected party, as well as witnesses, will be interviewed privately, if possible.
3. Supportive documentation and details will be gathered, such as sketches, photographs, etc.
4. A report will be prepared and include an analysis of the conditions and situations that led to the incident, as well as proposed actions to control the hazard and prevent similar incidents from occurring in the future. A copy of the report will be forwarded to the City Manager and the Program Administrator.

## **IX. CORRECTING UNHEALTHY OR UNSAFE CONDITIONS**

The Service Area Director and employee supervisors will be responsible for abating hazardous conditions and/or preventing further unsafe acts after consultation with the City Manager.

It is the City of Turlock's intention to eliminate all hazards and unsafe work practices as soon as possible after they are known. Some corrective actions require more time. Priority will be given to severe and imminent hazards.

Actions to be taken may include, but are not limited to:

- Fixing or replacing defective equipment
- Implementing new, safer procedures
- Installing guards and modifying equipment
- Conducting employee training
- Posting warning notices

All such actions taken and the dates they are completed shall be documented and reported to the Safety Committee.

When corrective action involves multiple steps or cannot be completed promptly, an action plan needs to be developed. While corrective action is in progress, necessary precautions are to be taken to protect or remove employees from exposure to the hazard. Imminent danger situations require immediate corrective action. If a condition of imminent danger is detected by an employee, he/she must immediately leave the area and report the situation to his/her supervisor, Service Area Manager, City Manager, or Program Administrator. Corrective action will be taken within 24 hours of detection.



For less severe situations, corrective action will be taken within 7 to 30 days of detection, provided employees are not exposed to serious hazards and take appropriate personnel protective measures.

## **X. TRAINING**

Employees will be trained regarding the purpose of the IIPP, proper communication procedures, and safe practices for their corresponding jobs. The training will be provided as follows:

- When the program is first established
- To all new employees
- To reassigned employees
- Whenever new hazards are introduced by new substances, processes, or equipment
- To familiarize supervisors with the hazards faced by their employees

Training will be conducted by the supervisor, Service Area Manager or designee in a manner and language that can be understood by the trainee. Such training may be integrated with other scheduled training including:

- New employee orientation
- Periodic health and safety awareness training
- Job-specific training
- Staff meetings
- Site tailgate safety meetings

In addition, employees are encouraged to discuss their safety concerns with their supervisors, Service Area Manager, or the Program Administrator. Training program will be reviewed and updated as needed.

## **XI. RECORDKEEPING**

No safety program can be successful without recordkeeping that enables the organization to learn from past experience and make corrections for enhanced safety. In addition, the



IIPP regulation requires records to be kept of the steps taken to establish and maintain the City of Turlock's Injury and Illness Prevention Program.

Documentation and records required by the IIPP standard will be maintained by City Departments or the Program Administrator for a minimum of three years. These records may include:

- Employee training documentation, including new employee safety orientation and IIPP training will be documented and kept in employee personnel files in the Human Resources Department
- Inspection records (including date, name of person who performed the inspection) will be maintained by at the department level
- Reports of unsafe conditions and work practices identified, corrective actions taken and date of correction, employee communications and official responses, Incident Reports, and investigation reports will be maintained by the Program Administrator

## **XII. CONTRACTOR/SUBCONTRACTOR EMPLOYEES**

Contractors or subcontractors whose employees may be covered by this standard while working at City job site shall be notified by the responsible Service Area Manager of the requirement to abide by all applicable parts of this program. This requirement may be fulfilled through job-specific safety meetings.

## **XIII. ADDITIONAL HEALTH AND SAFETY PROGRAMS**

The City will offer additional safety training to address specific occupational hazards. This training is regularly offered through the City's membership in the Central San Joaquin Risk Management Agency (CSJVRMA). This supplemental training may include, but not necessarily be limited to, the following:

- Traffic Control and Flagging
- Ergonomics
- Violence in the Workplace
- Blood Borne Pathogens
- Respiratory Protection
- Confined Space Entry



- Control of Hazardous Energy (Lockout/Tagout)
- Hearing Conservation
- Shoring and Trenching
- Emergency Preparedness
- Fire Prevention
- Process Safety Management of Acutely Hazardous Materials (T8 CCR 5189)
- Emergency Action Plan (T8 CCR 3220(a))

