

<i>INJURY ILLNESS PREVENTION PROGRAM</i>	POLICY	
	Document Number:	AS-RM-PL-IIPP-0100
	Version Number:	05

1.0 Purpose:

This policy establishes and maintains the Santa Clara Valley Transportation Authority's (VTA) Injury and Illness Prevention Program (IIPP). In addition, it assigns authority, responsibility and requirements relative to this program. This program meets the Cal/OSHA standard (8 California Code of Regulations (CCR) §3203) requirements for an Injury and Illness Prevention Program.

2.0 Scope:

This program applies to all VTA work units, departments, divisions, work sites, and employees. VTA contractors and non-contract personnel will follow these provisions while at VTA facilities.

3.0 Responsibilities:

- 3.1 The Enterprise Risk Manager is responsible for implementing the Injury and Illness Prevention Program throughout the Santa Clara Valley Transportation Authority. VTA designates the Enterprise Risk Manager as the person responsible for ensuring regulatory compliance in the safety, health and environmental areas. The Enterprise Risk Manager may designate other employees to provide assistance with implementation and compliance.
- 3.2 The IIPP Committee is designated to review and revise the written IIPP.
- 3.3 The General Manager, Chief Officers, Deputy Directors, Department Managers, Superintendents and unit Supervisors are responsible for implementing the requirements of VTA's Injury and Illness Prevention Program in their areas of responsibility. Managers and Supervisors must enforce the safety rules and procedures applicable to their work units.
- 3.4 Worksite Supervisors are designated to provide IIPP training for their employees. The Supervisor at each work site is responsible for ensuring the employee training is provided and documented. The workplace posting of all posters required by applicable federal and state occupational safety and health and labor laws and regulations is also the responsibility of the Supervisor.
- 3.5 Employees are responsible for knowing and complying with all environmental, safety and health rules and regulations and for following the applicable programs contained in the IIPP.

4.0 Policy:

4.1 VTA's Occupational Health & Safety Policy Statement:

It is VTA's policy to:

- Provide a safe and healthy workplace for employees.
- Conduct operations in a manner consistent with the protection of the natural environment.
- Maintain compliance with all applicable local, state, federal laws and regulations, and VTA standards.

Detailed environmental, health and safety procedures are set forth in the VTA Occupational Injury and Illness Prevention Program. The primary responsibility for compliance rests with the management of each division, department and unit. The Enterprise Risk Management Department will oversee and direct the environmental health and safety compliance activities at VTA.

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The VTA commitment to protect the environment and to provide a safe and healthy workplace extends as follows:

- No operation shall be performed in such a manner as to permit undue hazard to personnel or property, or to cause environmental contamination.
- Any recognized safety, health and environmental hazard shall be promptly corrected.
- Training of employees shall be provided to increase their awareness and knowledge of a safe, health and environmentally protective workplace.
- The Enterprise Risk Management Department is responsible for extending technical assistance to all VTA administrative, maintenance and operations Divisions in planning and implementing environmental, health and safety programs and activities.

4.2 VTA's System to Identify and Prevent Safety and Health Hazards:

4.2.1 Identification of Hazards: This IIPP system is to identify safety and health hazards using information from the Cal/OSHA standards and other relevant material in this program to be able to identify any potential hazards in the workplace. In addition, potential hazards may be identified by reviewing causes of injuries and illnesses (OSHA Log 300 and Workers' Compensation Employer's Report of Occupational Injury or Illness, also known as the "Employer's First Report"), periodic scheduled inspections, investigating injuries, illnesses and accidents, and reviewing information provided by employees.

4.2.2 Prevention of Hazards: Compliance with any applicable Cal/OSHA standard will ensure that hazards covered by such standards are addressed. In addition, any unsafe or unhealthy condition or work practice that is discovered will be corrected in a timely manner based on the following:

- If the hazard discovered may cause a serious injury or illness, it shall be corrected immediately or the employees removed from the area, source of exposure, or unsafe piece of equipment;
- If the hazard is one that is easily abated, it shall be corrected immediately;
- Other hazards shall be corrected in a timely manner; and
- Documentation used in discovering the hazard will be used to confirm abatement noting the correction on a new Safety or Health Hazard Report Form, (see AS-RM-IIPP-0201 Reporting Hazards) inspection checklist (see AS-RM-IIPP-0701 Safety Inspections) or an injury and illness investigation form (see AS-RM-IIPP-0302 Industrial Accident Investigation).

4.3 Elements Included in VTA's IIPP:

This IIPP includes all of the following minimum elements consistent with the Cal/OSHA regulations in 8 CCR §3203 Injury and Illness Prevention Standard and other applicable Cal/OSHA standards.

4.3.1 Injury And Illness Prevention Program Requirements: This IIPP includes all of the following minimum elements consistent with the Injury and Illness Prevention Standard:

- a) A system to identify and prevent safety and health hazards;

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- b) A program of periodic scheduled inspections;
- c) Investigation of injuries, illnesses, and accidents;
- d) An employee safety-training program;
- e) A system of communication with employees regarding safety and enforcement of safety rules; and
- f) Record keeping methods consistent with applicable requirements.

4.3.2 Other Mandatory Cal/OSHA Standards: This IIPP includes the following information that addresses certain standards that apply to all employees:

- a) Emergency action planning, including medical emergencies;
- b) Fire prevention and fire emergency planning;
- c) Work surface and work space safety; and
- d) Office safety and office chemical safety.

4.3.3 Additional Regulated Activities: VTA has included additional regulated activities and safety requirements in this manual. All of the following apply to VTA and are covered within this IIPP:

- a) Personal protective equipment use by employees;
- b) Ergonomics safety, (office ergonomics and repetitive motion injuries) including prevention of repetitive motion injuries, back and joint injuries and proper lifting methods;
- c) Hazardous substance handling by employees;
- d) Safe means of machine guarding and maintenance;
- e) Power tools and ladders;
- f) Vehicle operation by employees;
- g) Use of forklifts, battery charging, and material handling;
- h) Pressure vessels (air compressors) and LPG tanks;
- i) Construction activities on our sites;
- j) Security and violence prevention in the work place;
- k) Airborne substance and respiratory protection control program;
- l) Confined space entry program;
- m) Blood borne pathogens program;
- n) Lock-out/Tag-out programs
- o) Energized Electrical Work Safety Program
- p) Heat Illness Prevention Plan

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q) Environmental protection program; and

r) Fall protection program.

4.4 Periodic Scheduled Inspections:

4.4.1 It is the policy of the Santa Clara Valley Transportation Authority that each work site be inspected on a routine basis to identify and correct potential safety hazards. An active safety inspection program is a visible demonstration of VTA's commitment to safety. This Manual establishes requirements for work site safety inspections and provides guidelines for their performance. All VTA worksites must be inspected and documented at least monthly. Hazardous materials and hazardous waste storage and use areas must be inspected and documented every week. Hazardous waste tanks must be inspected and documented daily.

4.4.2 The Facility Maintenance Representative and the Maintenance Superintendent at each Division have the collective responsibility to schedule and conduct formal inspections of facilities, grounds, and equipment at least monthly using a checklist. Supervisors at the administrative offices are responsible to conduct the monthly safety inspections of their work area. (See IIPP procedure AS-RM-IIPP -0701 Safety Inspections for additional detail on this program.)

4.5 Investigating Injuries, Illnesses, and Accidents:

4.5.1 Policy and Responsibility: All injuries, illnesses, or accidents will be investigated to determine if any preventable safety or health hazard contributed to the occurrence. The Supervisor will conduct the investigation within a timely manner after being advised of the incident. If a reportable serious injury or death results, the Enterprise Risk Manager will ensure that a report is made to Cal/OSHA within eight (8) hours. Any hazardous condition or work practices that contributed to the injury, illness, or accident will be abated.

4.5.2 Documentation of Investigations: Each investigation of an injury, illness or accident is documented to indicate information about the incident, the investigation's finding, whether a workplace hazard contributed to the incident, how the hazard will be abated and the investigator. The investigation is documented by using workers' compensation form Employer's First Report or the Supplemental Injury, Illness and Accident Investigation. (See the IIPP procedure AS-RM-IIPP -0302 Industrial Accident Investigation for additional details on this procedure.)

4.6 Communicating With Employees about Safety and Enforcement of Safety Work Practices:

4.6.1 Policy and Responsibility: A system to communicate with employees about safety and to ensure compliance with safe work practices is in effect. Communications are implemented through safety meetings, Hazard Report procedures, one-on-one counseling, and disciplinary procedures. The Supervisor will ensure that effective employee communications are maintained through the following methods:

- Explanation of the IIPP and its procedures;
- Description of any new hazards that have been introduced or identified through inspection or investigation of injuries, illnesses, or accidents; and

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- Consideration of employee safety ideas and questions brought forward through the safety committees or through Hazard Reports (including anonymous ones).

4.6.2 **Employee Compliance:** Employees are required to comply with safe work practices. If non-compliance is observed, the following disciplinary measures as outlined in IIPP procedure AS-RM-IIPP-0600 Enforcing Safe Work Practices and Disciplinary Procedures will be used as appropriate to ensure future compliance. The method used should be selected based on the gravity of the violation and the frequency of such violation and be administered according to progressive employee discipline policies:

- Private counseling by the person responsible for implementing the IIPP or the employee's supervisor;
- Loss of incentives, negative effect on performance evaluation, and similar personnel actions;
- A written warning or warnings; and
- Suspension or termination.

4.6.3 **Documentation of Safety Communications and Enforcement:** Each instance of employee communication is documented. The documentation includes the following:

- Safety meetings are documented through a sign-in sheet;
- Written employee safety suggestions or questions are maintained on file along with the responses, including information on how the responses were provided to employees; and
- The Supervisor for the worksite will document actions taken to enforce compliance with safe work practices in cases that exceed verbal counseling in the employee's personnel record.

4.7 **Maintaining the Injury Illness and Prevention Program:**

4.7.1 **Reviewing and Updating the IIPP:** The Enterprise Risk Manager or designee periodically reviews this IIPP. The Enterprise Risk Manager verifies effective implementation of each element of the program, makes any changes needed, and communicates program status and changes made to management and to affected employees. The Enterprise Risk Manager uses the IIPP Committee to facilitate this review.

4.7.2 The IIPP Committee is composed of Environmental Health and Safety Staff, Transit System Safety Staff, Management from Bus and Light Rail Maintenance Operations and Facilities / Security Management. Representatives from other VTA Departments are invited to the meetings as active participants if the procedure being reviewed affects those Departments. The Enterprise Risk Manager and Chief Administrative Officer (CAO) review and approve the IIPP Procedures that come from the IIPP Committee. The IIPP Committee process and CAO review fulfils the responsibility delegated by the executive staff Committee on Procedures (COP) process.

4.7.3 The IIPP Committee reviews existing IIPP procedures and considers new procedures monthly based on a schedule that is set up each year. Approved updated procedures are immediately posted on the VTA VTAPS and a newly revised IIPP Program Document is published each year to replace the previous Program Document. Each meeting is conducted following an agenda

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with action items that are assigned to IIPP Committee members through the meeting minutes that document the deliberative process.

- 4.7.4 New Employees: Each new employee hired is subject to the IIPP. Each employee transferred to a new job is to be trained by their immediate supervisor in the safety aspects of the new assignment. The Supervisor will ensure that each new employee is included and will provide training on any provisions applicable to the new or any transferring employee's position.(See Section 8.0)

5.0 Definitions:

Injury Illness and Prevention Program: A written program promulgated by the State of California to provide a safe environment which is a fundamental prerequisite in controlling injuries.

6.0 Records:

- 6.1 Policy and Responsibility for IIPP Record-Keeping Requirements: The Supervisor will maintain records that document implementation of the IIPP. The following records will be maintained at a minimum for the period indicated:

The Written IIPP	Indefinitely
OSHA Log 300 and Summary Forms	5 Years
Inspection Forms and Environmental Records	3 Years
Investigation Forms	1 Year (if a Log 300 injury, 5 years)
Employee Training Forms:	
• Personnel Records	Duration of Employment
• Training Sign-up Sheets.....	3 Years
Records Relating to Employee Communication and Enforcement:	
• Safety Meeting Sign-up Sheets.....	3 Years
• Employee Suggestion/Question and Responses	3 Years
• Disciplinary Actions	3 Years
All Other Safety Records other than those Subject to the Access Standard.....	3 Years
Medical and Employee Exposure Records Subject to the Access	Employment Duration plus

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Standard.....

30Years

- 6.2 Posting Requirements Policy: It is the policy of VTA that all posters required by applicable federal and state occupational safety and health and labor laws and regulations will be posted in the workplace.

7.0 Appendices and References:

Cross Reference:

- Title 8 California Code of Regulations
- 29 CFR 1910 (Occupational Safety and Health Standards)
- 10 CFR Chapter 1, (Nuclear Regulatory Commission)
- 49 CFR 100-185 (Transportation of Hazardous Materials)
- California Health and Safety Code
- National Electrical Code
- California Building Code
- California Mechanical Code
- American National Standards Institute
- California Fire Code
- National Fire Codes and Standards (NFPA)
- All supporting documents to the above

8.0 Training Requirements:

- 8.1 Policy and Responsibility: Employees have been provided safety training in safe work practices and prevention of injuries and illnesses when the IIPP was first established and whenever a new hazard is identified. Training in safe work practices and prevention of injuries and illnesses is also given when the employee is reassigned or newly hired prior to exposure to any potential hazards.
- 8.2 Documentation of Training: Each employee's personnel records contain a form that indicates the status of the employee's training. The form indicates that IIPP training was provided and when additional training was received for new hazards, new assignments or to meet refresher training requirements.
- 8.2.1 Training sessions will be documented with a sign-up sheet that indicates the date, subject of training, trainer, attendees, and attendees' job functions or class. This form will be used to update individual employee training records.
- 8.2.2 The training each employee has received is also documented in the SAP database program. The Employee Development (ED) unit of the Employee Relations Department will record all training

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sessions from records provided to them by the Supervisors. (See AS-RM-IIPP- 0401 Safety Training for additional detail on safety training.)

9.0 **Summary of Changes:**

Revision date, January 22, 2014: This policy was amended to show approval by Nuria I. Fernandez. The Risk Management Department name was changed to the Enterprise Risk Management Department.

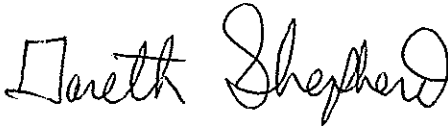


Revision Date April 15, 2013: The policy was revised to reflect new Procedure names and new position titles in use at VTA.

Additional Regulated Activities included in Section 4.3.3.

References to OSHA 200 Log dropped.

Revision date, July 29, 2009: Policy amended to delegate the responsibility for revision of the IIPP to the IIPP committee.

10.0 **Approval Information:**

<i>Prepared by</i>	<i>Reviewed by</i>	<i>Approved by</i>
 Gareth Shepherd Environmental Health & Safety Specialist	 Bill Lopez Chief Administrative Officer	 Nuria I. Fernandez General Manager