



Injury and Illness Prevention Program (IIPP)

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MANAGEMENT POLICY STATEMENT

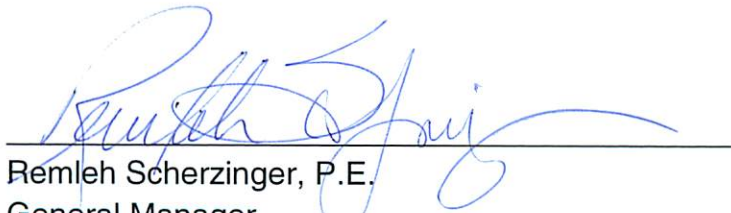
It is the policy of the Nevada Irrigation District ("District") to provide a safe and healthful work environment for all of its employees - an environment that is absent of recognized hazards that may cause, or is likely to cause, death or serious physical harm to its employees. In an effort to achieve this goal, the District maintains an Injury and Illness Prevention Program (IIPP) that conforms to the best safe practices of similar agencies.

This Injury and Illness Prevention Program document ("Program Manual") is incorporated into the District's Policy Manual as Policy #7015, and may be amended by the General Manager from time to time. For the purpose of this manual, the terms "superintendent" and "supervisor" are the same.

The management concept of the District is not production and safety, but rather, "safe production." When safe production is achieved, efficiency is attained simultaneously.

In addition, it is understood that a collectively involved and consulted workforce contributes to a work environment where health and safety are core values. District Management has a basic responsibility to make the safety of employees a primary objective; at the same time, workers have a right to work in places where all risks to their health and safety are properly controlled. All workers are encouraged to participate in controlling these risks by offering input and ideas to influence and maintain a safe work place.

The successful operation of the District depends not only on service to the public, but also how safely each job is performed. There is no job so important, or so urgent, that the time and equipment needed for safety can be avoided. Therefore, each employee is expected to give his/her full cooperation in making this program effective.


Remleh Scherzinger, P.E.
General Manager


Date

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RESPONSIBILITY

The District is committed to maintaining an effective IIPP. This commitment is backed by policies and procedures, as described in the District's Policy Manual and in this Program Manual. It is the responsibility of all managers, supervisors, and employees to understand and follow all aspects of the IIPP.

Ultimately, senior management has the overall responsibility to provide a safe and healthy work environment to its employees. However, the person with authority and responsibility for implementing the District's IIPP on a day-to-day basis is the Assistant General Manager. The Assistant General Manager has been designated to administer the District's IIPP and may assign safety and health related authority and responsibilities to the Safety Analyst, managers, supervisors, or employees.

Managers and Supervisors - Safety responsibilities for these individuals include:

- ❖ Enforcement of all safety rules in the Code of Safe Practices (general and specific) and ensure safe work procedures; and
- ❖ Instructing all employees, under their supervision, in safe work practices and job safety requirements; and
- ❖ Implementing and maintaining the IIPP in their work areas and for answering worker questions about the Program; and
- ❖ Ensuring that employees have the necessary safety training and proficiency when assigning work requiring specific knowledge, special operations or equipment.

In addition:

- ❖ Safety Analyst and managers are responsible for conducting post injury investigation; managers are responsible to see that subsequent appropriate corrective action is taken.
- ❖ Safety Analyst, managers and supervisors are responsible to investigate all injuries and accidents to determine their cause and potential corrective action.
- ❖ Safety Analyst and supervisors are responsible for training all new and existing employees in proper safety procedures and the hazards of the job.

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- ❖ Supervisors are responsible for conducting regular documented inspections of the work site to identify and mitigate unsafe actions and conditions that could cause accidents.
- ❖ Supervisors are responsible for holding scheduled safety meetings with employees.
- ❖ Supervisors are responsible for ensuring that all machinery, equipment, and workstations are maintained in a safe working condition and operate properly.
- ❖ Supervisors are responsible for maintaining good housekeeping at all times.
- ❖ Supervisors are responsible to report all injuries to the Human Resource Manager or his/her designee, and to the Safety Analyst

Employee Responsibilities – Safety responsibilities for all employees include:

- ❖ Follow safety rules, standards and policies, including training instructions.
- ❖ Report unsafe conditions or actions to the Supervisor or Safety Analyst promptly.
- ❖ Report all injuries to the Supervisor promptly regardless of how minor.
- ❖ Do not remove or defeat any safety device or safeguard provided for employee protection.
- ❖ Encourage co-workers by your words and example to use safe work practices on the job.

A copy of this IIPP is given to each employee, and a copy is available on the District website (www.nidwater.com) and at each site or facility.

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COMPLIANCE

The District's IIPP is intended to assist in keeping all employees as safe and healthy as possible. In addition, the IIPP confirms the District's commitment to its employees in providing a safe and healthy workplace, and verifies the District's intention to comply with applicable regulations.

The District's IIPP meets or exceeds regulations stipulated by Cal-OSHA and other state specific safety requirements. Based on these requirements, each employee is required to understand and comply with the following elements of the IIPP:

1. Responsibility
2. Compliance
3. Communication
4. Hazard Assessment
5. Accident/Exposure Investigations
6. Hazard Correction
7. Training and Inspection
8. Recordkeeping

The following efforts are utilized to ensure employee compliance with the safety program and all safety rules.

❖ Informing Employees

Employees are informed of changes to the IIPP and Safe Work Practices through written communications, training, and safety meetings, as soon as practical after changes are implemented.

❖ Evaluating Safety Performance

Safety compliance is part of every employee's performance evaluation,

❖ Training and Retraining

Training – Employees are trained on the IIPP and General Code of Safe Practices upon new-hire orientation; training on specific Codes of Safe Practices is done as needed. The importance of safe work practices and the consequences of failing to abide by safety rules is covered in new Employee Safety Orientation and regular safety meetings. This training helps to ensure that all employees understand and abide by the safety policies.

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Retraining - Employees that are observed performing unsafe acts or not following proper procedures or rules are retrained by their supervisor. If multiple employees are involved, additional safety meetings are held.

❖ Reward and Recognition

Although strict adherence to safety policies and procedures is required of all employees, the District periodically provides recognition of safety-conscious employees and job sites demonstrating safe work practices.

❖ Disciplinary Action

The failure of an employee to adhere to safety policies and procedures can have a serious impact on everyone concerned. An unsafe act can threaten not only the health and well-being of the employee committing the unsafe act, but can also affect the safety of his/her coworkers and the public. Accordingly, any employee who violates any safety policies is subject to disciplinary action.

Employees are disciplined for infractions of safety rules and unsafe work practices that are observed, not just those that result in an injury. Discipline is given to the employee for safety violations, not simply because the employee was injured on the job or filed a Workers' Compensation claim.

Violations of safety rules, standards, and policies are equal to violations of other District policies. Discipline for safety violations are administered in a manner that is consistent with the District's terms and conditions of employment, or labor contracts. Where violations occur after initial training, disciplinary action is progressive; however, some actions may be so serious or severe they merit bypassing some or all of the steps in the progressive disciplinary process.

Supervisors are subject to disciplinary action for the following:

- ❖ Failure to provide adequate training prior to job assignment.
- ❖ Failure to report accidents and provide medical attention to employees injured at work.
- ❖ Failure to control unsafe conditions or work practices.
- ❖ Failure to maintain good housekeeping standards and cleanliness in their departments.

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In all disciplinary actions, each situation is carefully evaluated and investigated. The particular step taken in the disciplinary process depends on the severity of the violation, employee history, and regard to safety. Managers and supervisors are encouraged to consult with the Assistant General Manager and Human Resources Manager (HR Manager) for any question about disciplinary action involving safety violations.

COMMUNICATION

The District's system of communication is designed to facilitate a continuous, two-way flow of safety and health information (among management, supervision and employees) in a form that is readily understandable for all personnel.

The District communicates safety in several ways which includes notices, newsletters, safety meetings, safety policy updates, memorandums, training, videos, and other written materials and discussions.

The District maintains open communication between management and staff on matters pertaining to safety. All input regarding safety is considered important, and employees are encouraged to actively participate in the safety program. Employees should feel free to express any safety concerns during safety meetings, individually to supervisors or in writing. All safety suggestions are given serious consideration. The District provides current safety news and activities, safety reading materials, signs, and bulletin board postings for easy access to information. Also, regular safety meetings are held so that all employees have an opportunity to receive safety training and voice personal opinions regarding safety and health matters.

Safety Meetings

For safety meetings, the following topics are used to solicit feedback and open discussion:

- ❖ Injuries and illnesses that have occurred and corrective action
- ❖ Incident investigations to assume overall safety improvements are being made
- ❖ Hazard inspection findings
- ❖ Hazard abatement needs
- ❖ Training activities
- ❖ Enhancements (or changes) to the IIPP

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Safety Rules and Regulations

The District's safety rules and regulations include the Codes of Safe Practice, training manuals and/or documents, postings, and written memorandums. All employees are required to comply with these documents.

Training

The District has developed a comprehensive safety training program. Employees are provided training on many general safeguards, as well as those safety activities that are job-specific, including Codes of Safe Practices, and specific safe practices and hazards that are unique to the employees' job assignment. New worker orientation includes a discussion of safety and health policies and procedures, with follow-up training by his/her Supervisor to ensure effectiveness.

HAZARD ASSESSMENT

Hazard Assessment and Control

The District conducts hazard inspections annually for offices and quarterly for shops, and employees are asked to participate. Additionally, the District may ask consultants, or other individuals from outside the District to conduct hazard assessments on its behalf.

Once hazards – unsafe acts or unsafe conditions – are identified, the District takes action to mitigate, if not eliminate the hazard. Employee assistance in controlling hazards is essential.

To assist in the identification and correction of hazards, the District has adopted methods to identify and evaluate hazards, along with procedures for correcting and documenting the hazard. The methods and procedures are amended or expanded to guard against injury from newly recognized and potential hazards in the workplace. As new hazards are identified or improved work procedures developed, they are incorporated into the District's safe work practice.

The following methods are utilized to identify hazards in the workplace:

- Accident Investigations
- Employee Observations
- Employee Feedback and Input
- Regulatory Requirements
- Periodic Safety Inspections
- Risk Analysis / Job Hazard Analysis (JHA)

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Hazard Evaluation

Factors that are considered when evaluating hazards include:

- Potential severity - The potential for serious injury, illness or fatality
- Likelihood of exposure - The probability of the employee coming into contact with the hazard
- Frequency of exposure - How often employees come into contact with the hazard
- Number of employees exposed
- Possible corrective actions - What can be done to minimize or eliminate the hazard
- Time necessary to correct - The time necessary to minimize or eliminate the hazard

HAZARD CORRECTION

Techniques for Correction Hazards - Overview

1. Avoidance and Elimination: If at all possible, the District seeks to avoid or eliminate identified risks so as to completely eradicate the problem.
2. Substitution: Especially when it comes to chemicals, the District seeks to substitute less toxic or less harmful chemicals for more dangerous substances.
3. Engineering Controls: These controls include machine guarding, active ventilation, noise reduction at the source, and providing of material handling equipment. These are basic and primary methods of control.
4. Administrative Controls: These controls include job rotation, additional policies and procedures, training and re-training of employees on job specific safety measures.
5. Personal Protective Equipment: These controls include hearing protection, hard hats, hand and eye protection. These are often the least effective controls for hazards and should be relied upon only when other controls are impractical.

Documentation of Corrective Action

Corrective actions taken to mitigate hazards are documented on forms that are provided by the Assistant General Manager, indicating the hazard description, location, priority (or potential severity), date of correction, and initials of the person verifying the correction (manager or Safety Analyst):

Completed forms are submitted to the Safety Analyst for filing.

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ACCIDENT/EXPOSURE INVESTIGATIONS

Accident

For the purpose of this IIPP, an accident is defined as any unexpected occurrence that results in injury to personnel, damage to equipment, facilities, or material, or interruption of normal operations.

Incident

For the purpose of this IIPP, an Incident is defined as any unexpected occurrence that nearly results in damage to equipment, facilities, or material, or interruption of normal operations (“a near accident”).

Investigations

Accidents and incidents are investigated in accordance with the guidelines contained in this program, and other District policies. Investigations focus on all causal factors and corrective action, including the identification and correction of hazards that may have contributed to the accident/incident. Unsafe acts, unsafe conditions, and incorrect practices are identified.

The purpose of the investigation is to determine the cause of the accident/incident and the corrective action needed to prevent future recurrence - not to fix blame or find fault. An unbiased approach is used to obtain objective findings.

Employees are responsible to notify the supervisor immediately after an accident or incident, regardless of the severity. Immediately upon being notified of an accident or incident, supervisors are required to notify their manager.

Accident Investigations

The Supervisor and/or Manager, together with the Assistant General Manager (or others designated by the Assistant General Manager) jointly investigate work-related accidents in a timely manner. This investigation includes minor accidents as well as accidents with serious injuries.

Incident Investigations

Managers consult with the Assistant General Manager and determine the need to investigate an incident. If a determination is made to investigate the incident, the manager and Assistant General Manager jointly investigate the incident.

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TRAINING AND INSTRUCTION

Employee Safety Training

Safety laws require that employees be trained in the safe methods of performing their job. The District is committed to instructing all employees in safe and healthful work practices. Awareness of potential hazards, as well as knowledge of how to control them, is critical to maintaining a safe and healthful work environment and preventing injuries. To achieve and maintain this, the District provides training to each employee on general safety issues and safety procedures specific to that employee's work assignment.

Every new employee is given instructions by their Supervisor or designated qualified person. A copy of this Program Manual and the District's Codes of Safe Practices, are provided to each employee.

Employee training is provided at the following times:

1. For new employees, during the first or second day on the job:
 - a) receive a safety orientation.
 - b) receive a copy of the IIPP, and acknowledge written receipt of it.
 - c) receive a copy of the Codes of Safe Practices with an overview, and acknowledge written receipt of it.
2. New job assignment - employees are trained before beginning the new assignment.
3. Whenever new substances, processes, procedures or equipment that represent a new hazard are introduced into the workplace.
4. Whenever Management is aware of a new or previously unrecognized hazard.
5. Whenever Management believes that additional training is necessary.
6. After serious accidents occur that relate to the employee's job.
7. When employees are not following safe work rules or procedures and they lack the knowledge, skills, or judgment to perform the work safely.

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Training Topic

Employees are trained on the hazards associated with their job duties through classroom instruction, on the job training, staff meetings, computer software courses, newsletters, and postings. Safety training topics include subjects of this Manual and the following, depending on job classification and duties:

- ❖ Bloodborne Pathogen Control Plan
- ❖ General Code of Safe Practices
- ❖ Injury Reporting
- ❖ Safety Rules Provided to Employee and Reviewed
- ❖ Ergonomics & Safe Lifting
- ❖ Disciplinary Action Policy
- ❖ Personal Protective Equipment Availability & Use
- ❖ Hazard Communication Program
- ❖ Hearing Protection
- ❖ Emergency Evacuation Procedures
- ❖ Heat Illness Prevention
- ❖ Work Place Violence
- ❖ Harassment

Training is conducted by the supervisor, foreman, Human Resources Manager, Safety Analyst, or other qualified employee or outside consultant. All training is documented and kept in the employees training files and/or Safety Office.

In addition, the District provides specific instructions to all workers regarding hazards unique to their job assignment, to the extent that such information was not already covered in other training.

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RECORDKEEPING

Written IIPP and Documentation Requirements

The District takes the following steps to implement and maintain its IIPP:

1. Evaluates employees of all elements of the IIPP
2. Evaluating safety performance of each employee
3. Trains employees and retrain (where safety performance such as knowledge, skills, and judgment is deficient)
4. Rewards and recognizes employees for safe conduct
5. Disciplines employees for failing to comply with the IIPP or the Codes of Safe Practices

The District has ten or more employees and keeps records as follows:

1. Records of scheduled and periodic inspections – This includes the person(s) conducting the inspection, the workplace Hazards (unsafe conditions and work practices that have been identified), and the actions taken to correct the Identified unsafe conditions and work practices; these are recorded on Hazard Assessment Records, and maintained for at least one (1) year.
2. Documentation of safety and health training for each worker – This includes the worker's name, training dates, types of training, and training providers; these are recorded on Worker Meeting/Training Records and Employee Safety Orientation Records, and maintained for at least one (1) year.
3. Receipt of IIPP and GCSP – This includes employees' acknowledgment of receipt and explanation of the IIPP and GCSP; this is recorded on the Employee Safety Orientation Record, and maintained for at least one (1) year.

Other Recordkeeping. The Human Resources Department is responsible for maintaining a variety of records, including injury and illness statistics. The District completes mandatory reporting forms and submits the forms to the state or federal government as required. Managers and supervisors are responsible for maintaining records on training – duplicate copies are submitted to the Safety Analyst. To the extent that these records are not confidential, they are available to employees.