

4. Elements Included in Employer's IIPP

This IIPP includes all of the following elements of 8 CCR §3203 and other applicable Cal/OSHA standards:

Injury and Illness Prevention Program Requirements: This IIPP includes all of the following minimum elements consistent with the injury and illness prevention standard:

- A system to identify and prevent safety and health hazards.
- Periodic scheduled inspections.
- Investigation of injuries, illnesses and accidents.
- Employee safety training.
- Communication with employees regarding safety and enforcement of safety rules.
- Recordkeeping consistent with applicable requirements.

Other Mandatory Cal/OSHA standards:

- Emergency action planning, including medical emergencies.
- Fire prevention and fire emergency planning.

Additional Regulated Activities: The employer has reviewed additional regulated activities and safety requirements. Those checked apply to this workplace and are covered within this IIPP:

- Personal protective equipment use by employees.
- Ergonomics safety, including prevention of repetitive motion injuries and back and joint injuries.
- Hazardous substance handling.
- Machine guarding and maintenance.
- Power tools and ladders.
- Vehicle operation.
- Forklifts, battery charging and material handling.
- Construction activities.

5. Periodic Scheduled Inspection

Responsibility and Frequency of Inspections: Periodic scheduled inspections are conducted by, or under the direction of, the person responsible for implementing IIPP at the following frequency:

Office Areas: _____

Other Areas (indicate area and frequency):

| Area | Inspection |
|------|------------|
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In addition, whenever information indicates that a previously unrecognized hazard may be present, the area in which the suspected hazard is present will be inspected promptly.

Documentation of Inspections: Inspection forms will be completed by the inspector for each inspection, noting the area inspected, person or persons conducting the inspection, findings and any deficiencies noted. Correction of deficiencies shall be accomplished according to Paragraph 4, Other Mandatory Cal/OSHA standards, and indicated on the inspection checklist.

6. Investigating Injuries, Illnesses and Accidents

Policy and Responsibility: Any injuries, illnesses or accidents will be investigated to determine if any preventable safety or health hazard contributed to the occurrence. The person responsible for implementing the IIPP will conduct the investigation within a timely manner after being advised of the incident. If a reportable serious injury or death results, the responsible person will assure that a report is made to Cal/OSHA within eight hours. Any hazardous condition or work practices that contributed to the injury, illness or accident will be abated according to the policy stated at Paragraph 4, Other Mandatory Cal/OSHA standards.

Documentation of Investigation: Each investigation of an injury, illness or accident will be 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 can be documented by using the *Employer's First Report* or the *Supplemental Injury, Illness and Accident Investigation*.

7. Safety Training for Employees

Policy and Responsibility: Employees have been provided training in safe work practices and prevention of injuries and illnesses when the IIPP was first established and whenever a new hazard is identified or an employee is reassigned or newly hired prior to exposure to any potential hazards.

The person responsible for implementing the IIPP is responsible for assuring the employee training is provided and documented. Supervisors and other designated employees may be designated to assist.

Documentation of Training: Training is documented in the following manner:

- 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.
- Training sessions will be documented with a sign-up sheet that indicates the date, subject of training, trainer and attendees. This form will be used to update individual employee training records.

8. Communicating with Employees about Safety and Enforcement of Safety Work Practices

Policy and Responsibility: A system to communicate with employees about safety and to assure compliance with safe work practices is in effect. Communications are implemented through safety meetings, anonymous notification procedures, one-on-one counseling and disciplinary procedures.

The person responsible for the IIPP shall assure 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.
- Consideration of employee safety suggestions and questions (including anonymous ones) and a response provided.

Employee Compliance: Employees are required to comply with safe work practices. If non-compliance is observed, the following disciplinary measures will be used as appropriate to assure 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 discipline employee relations 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.

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 response, including information on how the response was provided to employees.
- Actions taken to enforce compliance with safe work practices in cases that exceeds verbal counseling will be documented in the employee's personnel record by the person responsible for the IIPP.

9. Recordkeeping and Posting Requirements

Policy and Responsibility for IIPP Recordkeeping: Records that document implementation of the IIPP will be maintained by the person responsible for the program. The following records will be maintained for the period indicated, at a minimum:

- The Written IIPP..... Indefinitely
- OSHA Log 300 Forms..... 5 Years
- Inspection Forms 1 Year
- Investigation Forms 1 Year (if a Log 200 injury, 5 years)
- Employee Training Forms:
 - Personnel Records..... Duration of Employment
 - Training Sign-up Sheets..... 1 Year
- 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
- Employee Exposure Records (Subject to §3204)..... 30 Years
- Medical Records (Subject to §3204)..... Duration of Employment Plus 30 Years

Poster Policy: It is the policy of this employer that all posters required by federal and state occupational safety and health and labor laws and regulations will be posted in the workplace.

10. Maintaining the Injury and Illness Prevention Program

Reviewing and Updating the IIPP: This IIPP will be periodically reviewed by the person responsible for implementing it. This person shall verify effective implementation of each element of the program, make any changes needed and communicate program status and changes made to management and to affected employees.

New Employees: Each new employee hired will be subject to the IIPP. Each employee transferred to a new job will be trained in the safety aspects of the new assignment. The person responsible for implementation will assure that each new employee is included in the IIPP and will provide training on any provisions applicable to the new or any transferring employee's position.