

Injury and Illness Prevention Program

Our company has instituted a comprehensive and continuous occupational Injury and Illness Prevention Program (IIPP) for all employees.

Management's goal is to prevent accidents, reduce personal injury, occupational illness and to comply with all safety and health standards. The Injury and Illness Prevention Program (IIPP) has been developed to meet the written program requirements of Title 8, CCR, Section 3203.

The IIPP includes the following elements consistent with Title 8, CCR, Section 3203 and other applicable Cal/OSHA standards:

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

The IIPP is the foundation of our safety program. Separate and individual programs and procedures include information that addresses specific standards which apply to all employees: Those written programs and procedures include but, are not limited to;

- Emergency action planning, including medical emergencies and fire prevention
- Ergonomics safety, including prevention of repetitive motion injuries, back and joint injuries.
- Code of Safe Practices
- Critical Incident Procedures
- First Aid/CPR
- Personal protective equipment use by employees
- Hazard Communication
- Material Safety Data Sheets
- Fall Protection
- Ladder Safety
- Equipment/Machine Operations
- Hand and Power Tool Safety
- Powder-Actuated Tools
- Heat Illness
- Lockout/Tagout
- Scissors Lifts/Aerial Devices

- Scaffolds
- Safety Inspections
- Training
- Contractors

Management Approval and Persons Responsible:

Date: _____

Person responsible for implementing the IIP program:

Health and Safety Coordinator: _____ is responsible for overall management and administration of the Injury and Illness Prevention Program.

Health and Safety Coordinator:

The Health and Safety Coordinator is responsible to:

- Interpret new and existing local, state and federal health and safety regulations;
- Inform foreman of any legally required procedures, inspections, training, etc.;
- Insure that all required employee safety training and certifications are kept up to date;
- Investigate safety incidents and near loss incidents and prepare reports for management;
- Provide appropriate incident summaries, safety bulletins, training materials and other applicable information that enhances individual and group safety performance;
- Provide chemical and physical hazard evaluation/s.
- Consult and assist job site foreman in developing and implementing appropriate health and safety programs;
- Coordinate all Cal-OSHA (or equivalent) visits or inquiries;
- Audit our company health and safety programs.

Safety Policy Statement:

It is the policy of our company to provide a safe and healthful workplace. Every employee is responsible for his/her safety as well as for others in the workplace. To achieve our goal of maintaining a safe workplace, everyone must be safety conscious at all times. In compliance with California law and to promote the concept of a safe workplace, the Company maintains an Injury and Illness Prevention Program (IIPP). The IIPP is available for review by employees and/or employee representatives.

Health and Safety Rules and Procedures:

Procedures are necessary to delineate the minimum requirements to perform work safely and correctly. Procedures are documented and employees are trained on correct implementation of their work. Those procedures include:

- Code of Safe Practices;
- Job Safety Analysis
- Safety training certifications
- New hire orientation
- Equipment operation training
- Emergency response plan
- Near miss reporting procedures
- Compliance with ongoing client safety programs

System to Identify and Prevent Safety and Health Hazards:

The IIPP's system to identify safety and health hazards includes using information from Cal/OSHA standards and other relevant material to discover potential hazards in the workplace. In addition, potential hazards may be identified by reviewing causes of injury and illness (OSHA Log 300 and Worker's 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 evaluating information provided by employees.

Job Site Foremen:

It is the responsibility of all foremen to implement, on a day-to-day basis, the company IIPP Program. This includes the following eight basic elements:

- Responsibility
- Compliance
- Communication
- Hazard Assessment
- Accidental Exposure Investigation
- Hazard Correction
- Training and Instruction
- Recordkeeping

Prevention of Hazards:

Compliance with all applicable Cal/OSHA standards will be assured to address hazards covered by such standards. 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 employees will be 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.
- Root Cause Analysis/Accident Investigation Report/Safety Hazard Abatement Record
- Employer's First Report of Accident

Employee Compliance and Disciplinary Measures:

Employees are required to comply with safe work practices. Willful violations of safe work practices may result in the disciplinary action in accordance with company policy. 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:

Communication:

A system to communicate with employees about safety and to ensure compliance with safe work practices is in effect. Matters concerning occupational safety and health will be communicated to employees by written documentation, staff meetings, new employee orientation, specific training and postings.

The safety meeting shall be the primary means of communication with employees. Communication from employees to the supervisor and/or safety representatives about unsafe or unhealthy conditions is encouraged. Anonymous notification procedures are available through the use of safety suggestion forms available from the supervisor.

No employee will be retaliated against for reporting hazards or potential hazards or for making suggestions related to safety. The results of a suggestion will be communicated to the employees affected by the hazard.

Safety meetings are held weekly to discuss safety issues including employee suggestions and any other accidents or other pertinent safety issues that may occur.

Each instance of employee communication is documented. The documentation includes but, is not limited to the following:

- Safety meetings;
- Written employee safety suggestions or questions are maintained on file along with the response, including information on how the response was provided to employees;

Inspections:

The company will conduct weekly project safety audits to identify unsafe work conditions and practices.

The foreman will identify and evaluate hazards whenever new substances, processes, procedures or equipment are introduced onto the jobsite that represent a new occupational safety and health risk or whenever he is made aware of a previously unrecognized hazard.

Whenever information indicates that a previously unrecognized hazard may be present, the area in which the suspected hazard is present will be inspected promptly.

Critical Incident Procedures:

The procedures in the event of a serious injury/illness or death are outlined in the Injury and Illness Prevention Program under the file heading Critical Incident Procedure. The Critical Incident Checklist is also in the same file and is posted.

Accident/Near Miss Investigations:

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 conducting the investigation is the foreman. If a reportable serious injury or death results, the responsible person will assure that a report is made to Cal/OSHA within eight hours.

In the event of a 'Near Miss' incident that could have caused a severe injury or death, a Near Miss Report will be filled out and a meeting will be held to go over the incident and the findings of the report. The person responsible for filling out the report is the foreman.

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 and how the hazard will be abated.

Investigations are documented using the following reports:

- Accident Investigation Report
- Injury/Illness Investigation Report
- Employee's Report of Injury Exposure
- Near Miss Report
- Root Cause Analysis

Correcting Unsafe Conditions:

Whenever an unsafe or unhealthy condition/practice or procedure is observed, discovered or reported, the foreman will take appropriate corrective measures in a timely manner based upon the severity of the hazard. Employees will be informed of the hazard and interim protective measures taken until the hazard is corrected.

Employees may not enter an imminent hazard area without appropriate protective equipment, training and prior specific approval of the supervisor.

Globally Harmonized System (GHS)

The GHS is the United Nations' Globally Harmonized System of Classification and Labeling of Chemicals. The system establishes rules and regulations for hazardous chemicals in transportation, use in the workplace, consumer use, and special rules and regulations for pesticides. The GHS also contains new Material Safety Data Sheet (MSDS) requirements and Safety Data Sheet (SDS) requirements along with new hazard symbols. These set the standards for:

- Classifying chemicals.
- Hazard symbols.
- Requirements for labeling.
- MSDS requirements.

The purpose of the GHS is to harmonize the inconsistencies between various national and regional systems that control the classification of chemicals.

The GHS requirements adopted by our company directly affect three elements of the Hazard Communication Program.

- Labeling: GHS establishes new labeling requirements, standardized pictograms, signal words, and hazard statements.
- Classification: GHS establishes a single, common system of chemical classification.
- MSDS: MSDS becomes Safety Data Sheets (SDS). There are 16 sections in the new SDS with a set order along with information requirements.

Training:

Employees will be provided training in safe work practices and prevention of injuries and illnesses when the IIPP was first established whenever a new hazard is identified, an employee is reassigned or newly hired.

The company will ensure that foreman receive training to familiarize them with the safety and health hazards to which employees under their direction may be exposed. The company shall also ensure those foreman are informed of the regulatory requirements for occupational health and safety that impact their job.

A New Employee Orientation Checklist will be used to orient new employees. Specific hazards will be covered in addition to the general items.

Documentation of Training:

- Each employee’s personnel records contain a form “New Employee Safety Orientation” that indicates the status of the employee’s training. The form indicates that IIPP training was provided.
- Each specialized training that occurs is documented with a sign-up sheet that indicates the date, subject of training, trainer and attendees.

Recordkeeping:

The company shall keep records of safety audits, including the name of the person conducting the inspection, the unsafe conditions and work practices that have been identified and the action taken to correct these. These records shall be maintained for three years.

The company shall also keep documentation of safety and health training for each employee, including employee name, training dates, type of training and training provider. This documentation shall be maintained for three years. Safety training documentation will be maintained on the company wet site.

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.....3 Years
- Investigation Forms.....3 Years (If a Log 300 injury, 5 Years)
- Employee Training Forms:
 - i. Personnel Records.....Duration of Employment
 - ii. Training Sign-Up Sheets.....3 Years
- Records Relating to Employee Communication and Enforcement:
 - i. Safety Meeting Sign-up Sheets..... 3 Years
 - ii. Employee Suggestion/Question & Response.....3 Years
 - iii. Disciplinary Actions.....3 Years
- All Other Safety Records Other than Those Subject to the Access Standard.....3 Years
- MSDS’s/SDS’s, Medical and Employee Exposure Records Subject to the Access Standard.....Duration of Employment Plus 30 Years