

Injury and Illness Prevention Program



Revision Date:

Company Safety Guiding Principle

To our employees:

We are committed to providing our employees with a safe and healthy workplace.

The personal health and safety of our employees is our primary objective. A successful health and safety program must embody proper attitudes toward injury and illness prevention on the part of all employees. It requires cooperation in all health and safety matters, between supervisor and employee, and between each employee and co-workers. Only through a cooperative effort can we establish and preserve a health and safety program in the best interest of all. Employees are asked to inform their supervisor, or management of any work hazards or unsafe work practices. No employee should fear reprisal for notifying management of any safety hazards. In fact, we encourage all employees to inform us immediately of any hazard, no matter how small it may seem. We will give thorough consideration to all suggestions or recommendations made by employees to improve workplace safety. Similarly, we will take disciplinary action against any employee who willfully or repeatedly violates our workplace safety rules.

Sincerely,

Injury and Illness Prevention Program (IIPP)

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Injury and Illness Prevention Program (IIPP)

1.0 INTRODUCTION

Our Company is committed to providing a safe environment for our employees. It is our policy to maintain, as it is reasonably within the control of our company to do so, a work environment that will not adversely affect our employee's health and safety or subject them to avoidable risks of accidental injury. To accomplish this, we have developed this Injury and Illness Prevention Program (IIPP).

The goal of our IIPP is to assist our employees in identifying hazards in the workplace, determining how to control hazards that may occur, and take steps to prevent them from contributing to the cause of an employee injury or illness. The following describes specific requirements for program responsibility, compliance, communication, hazard assessment, accident/exposure investigations, hazard correction, training, and recordkeeping. The IIPP is intended to achieve the following objectives:

- Assign authority and responsibility for implementing the program
- Communicate with employees regarding health and safety matters
- Develop compliance strategies
- Provide procedures for identifying and evaluating hazards and unsafe conditions
- Investigate accidents and incidents
- Develop procedures for controlling hazards and unsafe conditions
- Provide employee training programs
- Maintain documentation for our Injury and Illness Prevention Program (IIPP)

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2.0 ROLES AND RESPONSIBILITIES

Program Administrator:

Our Injury and Illness Prevention Program (IIPP) Administrator is:

The IIPP Administrator has the authority and responsibility for implementing the provisions of this program. Additional responsibilities of the IIPP Administrator include:

- Advise senior management on safety and health issues
- Work with senior management to develop safety and health guidelines and policies
- Prepare and distribute our safety and health guidelines, policies and procedures
- Maintain current information on local, state and federal safety and health regulations
- Serve as a liaison with governmental agencies, insurance companies and medical providers
- Plan, organize and coordinate safety trainings
- Develop procedures for safe work practices and inspection guidelines
- Arrange for safety and health inspections and follow up to assure necessary corrective action is completed
- Coordinate responses to employee health- or safety-related complaints or concerns
- Establish, conduct and maintain an injury/illness/accident report and investigation program
- Coordinate and maintain injury and illness records
- Review injury and illness trends
- Establish a system to maintain records of inspections, employee safety training and medical evaluations
- Ensure OSHA compliance
- Assign specific responsibilities among employees with the appropriate interest, related responsibilities or training

Senior Management:

Our Senior Management is committed to instilling a culture of safety in the workplace and is responsible for:

- Providing appropriate financial, human and organizational resources
- Issuing a written safety and health policy as a core value of the organization
- Integrating the safety and health goals and objectives into the our business systems and processes
- Discussing safety and health processes and improvements regularly during staff or employee meetings
- Ensuring management is held accountable for accident-prevention processes
- Encourage employees to take an active part in maintaining a safety and health workplace
- Following established safety and health rules and procedures
- Discuss openly safety and health issues with employees during period tours or meetings
- Recognize employees for their safety and health efforts

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Managers and Supervisors:

Managers and Supervisors are responsible for implementing and maintaining the IIPP in their work areas and for answering worker questions about the IIPP. A copy of this IIPP is available from each manager and supervisor. Additional responsibilities of managers and supervisors include:

- Ensure that workplaces and equipment are safe, well maintained, and in compliance with external agency regulations and our company/ organization's policies, programs and practices
- Ensure that workplace safety and health practices and procedures are clearly communicated and understood by employees through training programs
- Enforce health and safety rules fairly and uniformly
- Evaluate employees on compliance with safe work practices
- Acknowledge employees who make a significant contribution to maintenance of a safe workplace and disciplining employees who fail to follow safe work practices
- Encourage employees to report workplace hazards without fear of reprisals
- Ensure that periodic, scheduled workplace inspections are conducted and that identified health and safety deficiencies are corrected in a timely fashion
- Ensure that workplace incidents (injuries, exposures, or illnesses) are reported, investigated, and that corrective actions are taken promptly
- Assign specific responsibilities among employees with the appropriate interest, related responsibilities or training

Employees:

Employees must comply with all applicable health and safety regulations, company policies, and established work practices.

This includes, but is not limited to:

- Observing health and safety-related signs, posters, warning signals and directions.
- Reviewing the building emergency action and fire safety plan
- Learning about the potential hazards of assigned tasks and work areas.
- Taking part in appropriate health and safety training
- Following all safe operating procedures and precautions
- Using proper personal protective and other required safety equipment
- Warning co-workers about defective equipment and other hazards
- Reporting unsafe conditions immediately to a supervisor, and stopping work if an imminent hazard is presented
- Participating in workplace safety inspections
- Reporting all work-related injuries and illnesses to their immediate supervisor

Working under the influence of alcohol or illegal drugs is specifically forbidden. You must report the use of prescription drugs that may affect alertness or work abilities to your supervisor.

Failure to comply with or enforce environment, health and safety rules and regulations may result in disciplinary action up to and including dismissal. Violation of work rules is a job performance issue addressed through the job performance and disciplinary process.

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3.0 COMPLIANCE

3.1 Management

Management is responsible for ensuring that all safety and health policies and procedures are clearly communicated and understood by all employees. Managers and supervisors are expected to follow and enforce the rules fairly and uniformly.

3.2 Employees

Employees are responsible for using safe work practices, following all directives, policies and procedures, and assisting in maintaining a safe work environment.

To ensure program compliance, our company will:

- Inform our employees of the provisions of our IIPP
- Enforce our rules and procedures fairly and consistently
- Evaluate the safety performance of all employees
- Recognize employees who demonstrate safe and healthful work practices
- Provide training to employees whose safety performance is deficient
- Discipline employees for failure to comply with safe and healthful work practices

3.3 Safety Disciplinary Policy

Allowing an unsafe act or condition to continue not only jeopardizes the individual and perhaps others, but it also undermines the entire safety and health program.

Our company believes that an injury and illness prevention program is unenforceable without some type of disciplinary policy. Our company believes that in order to maintain a safe and healthful workplace, employees are cognizant and aware of all the company/organization health and safety policies as they apply to general and specific job duties. The following disciplinary policy is in effect and applicable to all safety and health violations unless the seriousness of the violation would dictate going directly to Step 2, Step 3 or Step 4.

First Violation

Employee is advised they are not working safely. The supervisor will instruct the employee on:

- How to safely perform the operation or task
- The reasons for performing the operation or task safely

The Supervisor will also issue a written employee safety-warning report and place the safety-warning report in the employee's file.

Second Violation

Employee is advised they are not working safely. The supervisor will instruct the employee on:

- How to safely perform the operation or task
- The reasons for performing the operation or task safely

The Supervisor will complete an investigation to determine the cause of the violation. Depending on the findings, the supervisor will issue a written employee safety-warning report and place the safety-warning report in the employee's file. The employee is subject to a three-day suspension without pay.

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Third Violation

Employee is advised they are not working safely. The supervisor will instruct the employee on:

- How to safely perform the operation or task
- The reasons for performing the operation or task safely

The Supervisor will complete an investigation to determine the cause of the violation. Depending on the findings, the supervisor will issue a written employee safety-warning report and place the safety-warning report in the employee's file. A third violation within six months of the first violation will result in further disciplinary action up to and including termination.

Fourth Violation

Employee is advised they are not working safely. The supervisor will instruct the employee on:

- How to safely perform the operation or task
- The reasons for performing the operation or task safely

The Supervisor will complete an investigation to determine the cause of the violation. Depending on the findings, the supervisor will issue a written employee safety-warning report and place the safety-warning report in the employee's file. A fourth violation within twelve months of the first violation will result in termination of employment.

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4.0 SAFETY COMMUNICATIONS

Management recognizes that open, two-way communication between management and employees 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 and consists of one or more of the following items:

4.1 Training

- New worker orientation including a discussion of safety and health policies and procedures.
- Review of our IIPP
- Workplace safety and health training programs

4.2 Health and safety material and publications

- Posted or distributed safety information

4.3 Health and safety meetings

- Regularly scheduled safety meetings

4.4 Anonymous Hazard Reporting

- A system for employees to anonymously inform management about workplace hazards
- Ensuring effective communication of safety and health concerns by providing translation when appropriate
- A safety and health committee that meets regularly and prepares written records of the safety and health committee meetings

4.5 Anti Reprisal Policy

We will not discharge or discriminate against any employees in any manner for reporting unsafe or unhealthy work conditions and practices. We will hold any manager who violates this policy accountable by means of our established progressive disciplinary procedures. Employees who have knowledge of unsafe or unhealthy work conditions or practices and who intentionally conceal this information are in violation of our policy and are subject to our established progressive disciplinary procedures.

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5.0 HAZARD ASSESSMENT AND CONTROL PLAN

5.1 Purpose

The purpose of our Hazard Assessment and Control Plan is to assess the workplace for conditions or work practices that may contribute to the cause of an employee injury or illness. The information gained from hazard assessments will help us identify and eliminate actual and potential hazards, as well as monitor accepted safety standards, procedures, and equipment.

5.2 IIPP Administrator

The IIPP Administrator is responsible for ensuring that our Hazard Assessment and Control Plan is effectively implemented.

5.3 Procedures

Our Hazard Assessment and Control Plan will consist of:

- Periodic assessments of the workplace
- Identification of hazard controls
- Employee training
- Recordkeeping

5.3.1 Periodic Workplace Assessments

Periodic assessments to identify and evaluate workplace hazards are performed by the following competent observer(s) in the following areas of our workplace:

Competent Observer	Area

Periodic assessments are performed according to the following schedule:

-
- When new substances, processes, procedures or equipment which present potential new hazards are introduced into a workplace;
- When new, previously unidentified hazards are recognized;
- When occupational injuries and illnesses occur;
- When we hire and/or reassign permanent or intermittent workers to processes, operations, or tasks for which a hazard evaluation has not been previously conducted; and
- Whenever workplace conditions warrant an assessment.

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We will use the Hazard Assessment Checklist (**Appendix A**) to complete our assessments. The IIPP Administrator will verify workplace hazard assessments are conducted per the workplace hazard assessment schedule and that suitable action is taken to adequately control hazards discovered during the hazard assessments.

The IIPP Administrator will review and revise the Hazard Assessment Checklist and other documents used as inspection guides as deemed necessary and when new equipment is purchased, new procedures are instituted, or when injuries reveal previously unsuspected hazards.

The IIPP Administrator will make available to other staff members the results of the inspections. The primary goal is to make other staff members aware of the hazards identified and to solicit feedback.

5.3.2 Follow-up on Non-Conformities – Corrective Action

In order for the assessment to contribute to risk reduction, the IIPP Administrator or designated associate(s) will review the information and assure that the corrective action(s) that has been identified to eliminate/mitigate an identified uncontrolled exposure is implemented as soon as possible.

We will use the Identified Hazard Assessment and Correction Form (**Appendix B**) to track the results of the inspections, as well as the corrective actions taken.

5.3.3 Imminent Danger

Evacuation of all employees, except those trained and qualified to correct the condition, is required in situations where a hazard is judged as an immediate danger to employees. Employees working to correct the hazard are required to use the appropriate protective equipment, devices, and procedures.

5.3.4 Employee Training

As part of our Hazard Assessment and Control Plan we will provide training for employees who are performing the assessments. Training will be conducted according to the following schedule:

- Prior to undertaking an assessment, and annually thereafter
- Whenever new equipment, work flow design changes, or hazards are introduced into their work area

5.3.5 Internal Audit

The IIPP Administrator will conduct an annual review of this program.

5.3.6 Recordkeeping

We will maintain the following records on file:

- Our Hazard Assessment and Control Plan document
- A copy of all inspections, results, and corrective actions (retention requirement: 5 years)
- A copy of all purchased materials/services related to the inspection corrections
- Written training records for each employee detailing the extent of training received and the date it was received (retention requirements: duration of employment)
- Outside agencies and/or our insurance companies may conduct regular or periodic inspections. We will retain written documentation of third party inspections per the requirements of applicable local, state and Federal requirements

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6.0 INJURY/ ILLNESS REPORTING, INVESTIGATION AND RECORDKEEPING

6.1 Purpose

The purpose of our Injury/Illness Reporting, Investigation and Recordkeeping program is to establish a consistent approach for the reporting, investigation, and recordkeeping of all suspected work-related injuries/illnesses as well as to comply with all of the provisions of OSHA's Recordkeeping Standards (29CFR1904). The prompt reporting and investigation of work-related injuries and illness promotes a safe work environment by heightening safety awareness, identifying hazardous conditions and practices, notifying responsible parties who can alert others doing related tasks, and initiating equipment and procedure changes believed effective in preventing similar future occurrences.

This program establishes the procedures, objectives, and administrative requirements of our Injury/Illness Reporting, Investigation and Recordkeeping Program.

Our intention is to thoroughly investigate and document all work-related accidents, incidents and illnesses.

The purpose of the investigation process is not to place blame but rather to determine the root causes of accidents and implement controls to reduce and potentially eliminate the recurrence of similar accidents.

6.2 Program Administrator

The Administrator for our Injury/Illness Reporting, Investigation and Recordkeeping program is:

The Program Administrator has full authority to make necessary changes to ensure its success. The Program Administrator may designate another/other associate(s) to conduct the actual accident/illness investigations.

6.3 Procedures

Four types of activities are required to meet "leading practices" and the OSHA standards:

- Reporting of work-related injuries and illnesses and near-misses
- Prompt investigation of all accidents and near-misses
- Maintain an up-to-date OSHA 300 Log
- Recordkeeping

These activities are explained in the further detail below.

6.3.1 Reporting Work-Related Injuries/Illnesses and Near Misses

A. Employee Reporting and Immediate Follow-up

Every employee must report to his or her supervisor any work-related injury, illness, exposure or near-miss. In the event of a serious injury, illness or exposure incident, the employee, the employee's supervisor or other designated individual must immediately notify the Program Administrator. We define an injury or illness as "serious" if it:

- Requires inpatient hospitalization for a period in excess of 24-hours for other than medical observation;
- An employee suffers a loss of any member of the body; or
- An employee suffers any serious degree of permanent disfigurement.

Employees who fail to report a work-related injury, illness, or a serious near-miss may incur disciplinary action and the denial of benefits as provided in the workers compensation statutes.

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Once advised of an employee injury or work-related illness, a near-miss incident, or an exposure event, the employee's supervisor on duty at the time of the incident will report immediately to the scene of the occurrence to assure prompt medical attention is given to the staff member(s) involved and address any safety hazards which may have caused or contributed to the incident.

The designated employee must accurately complete the Investigation/Corrective Action Report (**Appendix C**). The IIPP Administrator or designated associate(s) will verify that the report is complete and document the names of any co-workers of the injured staff member who may have witnessed the incident.

B. Fatalities or Catastrophes

While the chance of fatal or catastrophic injuries is not very likely, we will comply with local, state and federal employee fatality and serious injury reporting requirements.

The IIPP Administrator or designated associate(s) must orally report, within 8 hours, to the Area Office of the Occupational Safety and Health Administration any work-related fatality or incident resulting in the in-patient hospitalization of 3 or more employees.

NOTE: California employers are required to report immediately (as soon as practically possible but not longer than 8 hours) to the nearest District Office of the Division of Occupational Health any serious injury or illness, or death, of an employee occurring in a place of employment or in connection with any employment.

6.3.2 Accident Investigations

The Program Administrator or designated associate(s) will perform our accident, illness, exposure or near-miss investigations using the Investigation/Corrective Action Report (**Appendix C**). The Program Administrator or designated associate(s) are responsible for seeing that the reports are filled out completely and any corrective actions are addressed. Guidelines for conducting effective Accident Investigations are included in **Appendix D**.

The Program Administrator or designated associate(s) will, on an as-needed basis:

- Implement temporary control measures to prevent any further injuries to employees.
- Review the equipment, operations, and processes to gain an understanding of the accident situation.
- Identify and interview each witness and any other individuals who might provide clues to the accident's cause.
- Investigate causal conditions and unsafe acts and make conclusions based on facts.
- Complete an accident investigation report, provide recommendations for corrective action and indicate recommended changes or additions to the workplace safety rules.
- Indicate the need for additional or remedial safety training.

The investigation of an accident that results in death is a complicated task and highly unusual. What may initially appear to be the cause may not be after the investigation. Guidelines specific to investigating a fatality are included in **Appendix D**.

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6.3.3 OSHA 300 Log

Regardless of any admission of liability for the injury, the Program Administrator or designated associate(s) will enter on the OSHA 300 Log within six (6) days of occurrence, all injuries or work-related illness incurred or alleged by an employee that meet the recording requirements, including:

- Medical treatment beyond first aid (includes managing and caring for an employee for the purpose of combating disease or disorder)
- Fatality
- Loss of consciousness
- Restricted work activity
- Job transfer
- Working less than a full day
- Days away from work
- Needle-stick injuries and cuts with potentially contaminated sharp objects

If an injured employee is unable to perform their regular work assignment and is temporarily assigned to a different job, the number of days assigned to the restricted job, are entered on the log in the appropriate columns.

We will conspicuously post a copy of the Annual Summary of Occupational Injuries and Illnesses (OSHA 300A Log) in the facility, with the year ending totals.

The following are not considered medical treatments and are not recordable:

- Visits to a doctor or healthcare professional for observation or counseling
- Diagnostic procedures including administering prescription medications that are solely for diagnostic purposes
- Use of non-prescription medications at non-prescription strength
- Administration of tetanus immunizations
- Cleaning, flushing, or soaking wounds on the skin surface
- Use of wound coverings, e.g., gauze pads, BandAids™, or SteriStrips™
- Use of hot or cold therapy
- Use of eye patches
- Use of any non-rigid means of support, e.g., wraps
- Drinking of fluids to relieve heat stress
- Drilling of fingernails or toenails to relieve pressure, or draining fluids from blisters
- Use of simple irrigation or cotton swab to remove foreign bodies from the eye
- Use of irrigation, tweezers, cotton swab, or other simple means to remove splinters or foreign material from areas other than the eye
- Use of finger guards
- Using massages
- Use of temporary immobilization devices while transporting an accident victim, e.g., splints, neck collars, or backboards

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6.3.4 Recordkeeping

We will maintain the following records:

- This Injury/Illness Reporting, Investigation, and Recordkeeping document
- Completed Employee's First Report of Injury Forms
- Completed Accident Investigation Forms
- Records of post-accident repairs/follow-up
- OSHA Form 301, state-specific Employers First Report of Injury forms, and OSHA Form 300 (and 300A) is maintained on site for five years and on file (may be off site) on a permanent basis

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7.0 HEALTH AND SAFETY ORIENTATION AND TRAINING

7.1 Purpose

The purpose of our Employee Health and Safety Orientation and Training program is to establish a structure for the training of all new employees and the systematic retraining of all current employees, so that all employees know and can demonstrate the safe procedures associated with their job.

7.2 Program Administrator

The Administrator of our Health and Safety Orientation & Training Program is:

The Program Administrator has full authority to make necessary changes to this program to ensure its success. The Program Administrator may designate another/other associate(s) to conduct the actual employee orientation and safety training.

The Program Administrator or designated associate is responsible for assuring that the following activities are completed within the OSHA required timeframes and conform to the specific requirements, including documentation:

- New employee orientation
- Job-specific training
- General safety training
- Retraining of employees
- Recordkeeping

7.3 Procedures

Injury and illness prevention training is provided:

- When the IIPP is first established;
- When new employees are hired;
- When employees are given new job assignments for which training was not previously received;
- Whenever new substances, processes, procedures or equipment are introduced to the workplace and represent a new hazard;
- Whenever management is made aware of a new or previously unrecognized hazard; and
- When employees become supervisors (so that they can familiarize themselves with the safety and health hazards to which employees under their immediate direction and control are exposed).

7.3.1 New Employee Orientation

Workplace safety and health orientation begins on the first day of initial employment or job transfer. We educate and train our new employees on applicable safety policies and procedures prior to commencement of work or transfer to a new position. In addition:

- Employees have access to a copy of the IIPP program for review and future reference
- Managers ask questions of employees and answer employee questions to ensure the employees have sufficient knowledge and understanding of safety rules, policies, and job-specific procedures to safely perform their job duties

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All new employees receive safety training that addresses their job specific hazards along with Federal and State OSHA safety awareness training requirements.

A detailed list of the safety awareness training that is available and provided to our employees is maintained in **Appendix E**.

Safety orientation training is documented on the Safety Orientation Checklist located in **Appendix F**. Employees will certify that they know, understand, and will follow safety procedures.

7.3.2 Job-Specific Training

We conduct job-specific training for employees new to the respective work areas.

Job-specific training consists of:

- Verbal-specific directions on how to perform the job tasks safely
- Observation of employees performing the work
- Demonstration of safe work practices or remedial instruction to correct observed training deficiencies

Employees new to a work area must demonstrate the ability to perform job duties in a safe manner before they are permitted to work without supervision. After initial job-specific training is completed, the responsible individual for each work area verifies that additional specialized training on new or seldom used procedures/equipment is provided before employees are allowed to perform the procedure or use the equipment.

7.3.3 General Safety Training

General safety training refers to instruction or guidance which is of general applicability and not related to specialized jobs or procedures. Examples include office safety, fire safety and general hazard awareness. The IIPP Administrator will conduct regularly scheduled training on general safety topics.

7.3.4 Retraining for All Employees

All employees receive periodic updates on safety rules, policies, procedures, and any changes made to the IIPP. Individual employee retraining occurs after any work-related injury resulting from an unsafe act or when a manager/supervisor observes employees displaying unsafe acts, practices, or behaviors.

The Program Administrator or designated associate verifies that all employees are retrained on those subjects which are applicable to their jobs on at least an annual basis.

Updated training is conducted if procedures are added or changed, if new equipment or a new process is introduced, or if new hazards are introduced into the facility. All retraining is documented and maintained on file. The Worker Training and Instruction Record located in **Appendix G** is used to document training.

7.3.5 Recordkeeping

The following records are maintained on file:

- Our Employee Health and Safety Orientation and Training Policy
- Completed Safety Orientation Checklists (**Appendix F**)
- Written training records for each employee detailing the extent of training received and the date it was received
- Orientation and annual training records are retained for the duration of employment

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8.0 RECORDKEEPING – Compliance and Documentation of our Safety Policy

Our company maintains the documentation of our implementation and maintenance of this IIPP as follows:

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Our company maintains the documentation of our implementation and maintenance of this IIPP as follows:

Documents are kept for a period of 5 years:

1. Safety Inspection and Hazard Correction records
2. Accident Investigations
3. Documentation of Supervisory Training
4. Employee Safety Training records
5. Safety meeting minutes
6. OSHA Logs are maintained
7. Medical monitoring records
8. Records of the required Department of Motor Vehicles (DOMV) drug testing, license reminder, medical reminders, and green cards
9. Documentation of periodic IIPP review

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9.0 ERGONOMICS PROGRAM

9.1 Purpose

The purpose of our Ergonomics Program is to prevent the pain and suffering associated with ergonomic-related injuries. This is done through a combination of evaluation of workstations and work practices, training, and implementation of ergonomics control strategies.

9.2 Program Administrator

Our Ergonomics Program Administrator is:

The Program Administrator is responsible for ensuring that the following activities, as specified in this program, are completed within the established timeframes and conform to the specific requirements, including documentation:

- Evaluate risk factors of each job
- Establish procedures to reduce risk factors
- Establish incident reporting and evaluation requirements
- Train employees
- Recordkeeping

9.3 Ergonomics Program

Our company has a proactive Ergonomics Program, which focuses on making changes when risks have been identified, as well as incorporating ergonomics into the design phase of new processes. The following components are included in our program:

9.3.1 Management Leadership

Management is committed to the ergonomics process. Management supports the efforts of the Ergonomics Program Administrator by pledging financial and philosophical support for the identification and control of ergonomic risk factors. Management will support an effective Musculoskeletal Disorder (MSD) reporting system and will respond promptly to reports. Management will regularly communicate with employees about the program.

9.3.2 Employee Participation

The Program Administrator will solicit assistance from employees with identifying ergonomic risk factors, worksite evaluations, development and implementation of controls, and training. Employee participation in the program will occur only during company time.

9.3.3 Evaluation of Risk Factors

A) Injury and Illness Records are reviewed to:

- Identify injuries which can be classified as an ergonomically-related disorder and incidents which may be related to workplace ergonomic risk factors
- Categorize injuries/incidents identified by job and work task
- Analyze results to determine whether patterns or trends exist

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B) A Job Safety Analysis (JSA) is conducted to:

- Determine if uncontrolled ergonomic risk factors are present
- Recommend ways to eliminate or minimize the risk factors identified

The General Ergonomic Assessment Form (**Appendix H**), Optimal Computer Workstation Diagram (**Appendix I**) and Computer Workstation Evaluation Tool (**Appendix J**) are used to evaluate risk factors and document assessments.

9.3.4 Procedures to Reduce Risk Factors

Activities involving repetitive bending, lifting, twisting, reaching, standing or sitting for long periods of time, awkward postures (e.g., reaching above your head) can cause ergonomic stress and, especially over time, result in injury.

To minimize the adverse effects of these activities, we will consider both engineering and administrative controls:

A. Engineering Controls: Involve making changes to workstations, tools or equipment used on the job, or changing the way a job is done to avoid work-related musculoskeletal hazards. They are preferred over all other controls because they make permanent changes that eliminate the hazard at the source.

B. Administrative Controls: Focus on personnel solutions.

- Selecting workers to fit the job:
 - written job description
 - physical exams
- Training employees:
 - to recognize the dangers and symptoms of ergonomic-related disorders
- Schedule breaks:
 - allow for rest and recovery
- Worker rotation to reduce exposure time
 - Rotation of workers through different jobs will be done with caution

9.3.5 Early Reporting

- Employees are instructed and encouraged to report early signs and symptoms of work-related MSDs to their supervisor
- The supervisor investigates the complaint and determines if further evaluation of the employee's work is necessary; she/he reports this to the Program Administrator
- The Program Administrator reviews all reports of ergonomic stress and ensures a prompt response to reduce the potential for continuing stress. This may include:
 - Implementing engineering changes
 - Education of employee in better work method

9.3.6 Employee Training

Employees participate in general orientation and job-specific safety training sessions at the time of initial assignment and:

- Annually thereafter
- Whenever new hazards or additional precautions are introduced into their work area

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9.3.7 MSD (Medical) Management and Early Return-to-Work

Pursuant to the law, our company provides medical care to all employees injured at work. In the event of a work-related injury or illness, the health care provider will:

- (1) Provide diagnosis and treatment for our employees;
- (2) Determine if reported MSD signs or symptoms are work-related;
- (3) Comply with our Early Return-to-Work program by recommending restricted, modified, or transitional work duties when appropriate;
- (4) Develop a positive working relationship with our workers' compensation carrier.

Our company has an aggressive Early Return-to-Work program and will offer return-to-work opportunities to all injured employees in accordance with work restrictions identified by a recognized health care provider.

9.3.8 Program Evaluation and Follow Up

Monitoring and evaluation will be conducted on an on-going basis, in order to ensure that issues have been addressed and that new problems have not been created. The methods include use of individual interviews and checklists to reevaluate the job/task to ensure that risks have been reduced, minimized, or eliminated.

9.3.9 Recordkeeping

We maintain the following records on file:

- This Ergonomics Program document
- Written Evaluations of Risk Factors
- A copy of all inspections, results, and corrective actions (retention requirement: 3 years)
- Written training records for each employee detailing the extent of training received and the date it was received (retention requirement: duration of employment)

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10.0 SECURITY AND WORKPLACE VIOLENCE

10.1 Purpose

The purpose of our Security and Workplace Violence Prevention program is to prevent as far as possible, acts of violence against our employees whether it be loss of life or injuries.

What do we mean by workplace violence? Workplace violence can be any act of physical violence, threats of physical violence, harassment, intimidation, or other threatening, disruptive behavior that occurs at the workplace.

10.2 Roles and Responsibilities

Program Administrator:

The Administrator of our Security and Workplace Violence Program is:

The Program Administrator is responsible for assuring that the following activities, specified in this program are completed within the specified timeframes and conform to the specific requirements, including documentation.

- Completing a Threat Assessment and Security Analysis
- Identifying prohibited behavior
- Implementing prevention practices
- Establishing prohibited behavior disciplinary procedures
- Training employees
- Recordkeeping

Senior Management/Human Resources:

- Has developed a policy statement that indicates that our company will not tolerate violent or disruptive behavior and that all reports of incidents will be taken very seriously and dealt with appropriately
- Ensure that our company's Employee Handbook has been provided to all employees and that all employees are aware of the procedures and instructions in them
- Provide adequate resources for employee training and awareness
- Include workplace violence training in all employee orientation and supervisory training sessions
- Provide funding for appropriate safety and security of employees
- Ensure that performance standards of appropriate staff reflect the importance of workplace safety and security
- Provide for supervisory training which includes basic leadership skills, such as setting clear standards of conduct and performance, addressing employee problems promptly, and using the probationary period, performance counseling, discipline, alternative dispute resolution, and other management tools conscientiously
- Provide technical expertise and consultation to help supervisors determine what course of administrative action is most appropriate in specific situations
- Determine whether sufficient evidence exists to justify taking disciplinary action once the investigation of any misconduct is complete
- Help supervisors determine proper reasonable accommodation

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Managers & Supervisors:

- Inform employees of company workplace violence policies and procedures
- Ensure that employees know specific procedures for dealing with workplace threats and emergencies, and how to contact police, fire, and other safety and security officials
- Ensure that employees with special needs are aware of emergency evacuation procedures and have assistance (as necessary) regarding emergency evacuation situations
- Respond to potential threats and escalating situations by notifying the Program Administrator
- Take all threats seriously
- Check prospective employees' backgrounds prior to hiring

Employees:

- Be familiar with our policy regarding workplace violence
- Be responsible for securing their own workplace
- Be responsible for reporting strangers to supervisors
- Be aware of any threats, physical or verbal, and/or any disruptive behavior of any individual and report such to supervisors
- Be familiar with local procedures for dealing with workplace threats and emergencies
- Do not confront individuals who are a threat
- Be familiar with the resources of the Employee Assistance Program
- Take all threats seriously

10.3 Procedures

Our Security and Workplace Violence Safety Plan includes the following activities:

- Completing a Threat Assessment and Security Analysis
- Identifying prohibited behavior
- Implementing prevention practices
- Establishing prohibited behavior disciplinary procedures
- Training employees
- Recordkeeping

These activities are explained in the further detail below.

10.3.1 Threat Assessment and Security Analysis

The Program Administrator or a designated associate conducts an initial and an annual security and workplace violence assessment of each company department/location. The assessment includes:

- review of any reports of violence
- physical inspection of the workplace and review of work tasks
- an employee survey

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A. Record Review

A retrospective review of employee reports of violence will identify the prevalence of, and potential for, security issues and workplace violence. These may be reported on the OSHA 300 logs, records of assault incidents or near assault incidents, insurance records, police reports, accident investigations, grievances or verbal complaints, and other relevant records.

B. Physical Inspection of the Workplace and Review of Work Tasks

A physical review of the workplace and employee work tasks is conducted to determine the potential for security and workplace violence issues. This inspection indicates the presence of any hazards, along with conditions, operations, and situations that might place workers at risk of physical or verbal assault. The following factors will be considered:

- Physical location and layout of the facility
- Exchange of money with the public
- Employees working alone or in small numbers
- Employees working late at night or early in the morning hours
- Location in a high crime area
- Guarding valuable property or possessions
- Working in community settings

A Physical Security/Threat Assessment Checklist is included in **Appendix K**. This checklist assists in identifying physical security gaps.

C. Employee Survey

Employees are surveyed regularly to identify any workplace violence concerns. A copy of our Employee Security Survey is located in **Appendix L**.

10.3.2 Prohibited Behavior

To provide a safe and violence-free workplace, we prohibit any employee from engaging in any act either on company premises or during the performance of work-related duties that:

- Threatens the safety of another employee or visitor
- Affects the health, life, or well-being of an employee or visitor
- Results in harm to an employee or visitor

Such acts include, but are not limited to:

- Threatening, intimidating, coercing, harassing, or assaulting another person
- Sexually harassing an employee, or visitor
- Carrying concealed weapons, or concealing a weapon on the property
- Allowing unauthorized persons access to the building or confidential information without management permission
- Using, duplicating, or possessing keys to the building or offices within the building without authorization
- Stealing, or attempting to steal, property of the companies', another employee, or visitor
- Damaging, or attempting to damage, property of the companies', another employee, or visitor

Additional behavior-related workplace violence information is located in **Appendix M**.

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10.3.3 Prevention Guidelines

Appropriate prevention guidelines are implemented to address security and workplace violence issues identified by the threat assessment and security analysis. Prevention guidelines may include activities such as employee background checks and physical and administrative controls.

Additional workplace violence prevention and control information is available in **Appendix N**.

10.3.4 Employee Disciplinary Policy and Procedures

While workplace violence is unacceptable, a fair and impartial policy is in place to assure employees of fair and equitable treatment when accused or found in violation of this policy.

10.3.5 Training

One of the most critical components of any company's safety program is training. All employees should know how to recognize and report incidents of violent, intimidating, threatening, and disruptive behavior. All employees will have phone numbers for quick reference during a crisis or an emergency. Workplace violence prevention training for employees will include, at minimum, the following topics:

- Our company's workplace violence policy
- Encouragement to report incidents and the procedures to do so
- Ways of preventing or defusing volatile situations or aggressive behavior
- Ways to deal with hostile persons
- Managing anger
- Techniques and skills to resolve conflicts
- Stress management, relaxation techniques, wellness training
- Security procedures, e.g., the location and operation of safety devices such as alarm systems
- Personal security measures

In addition to the training suggested above for employees, special attention will be paid to general supervisory training. The same approaches that create a healthy, productive workplace can also help prevent potentially violent situations. It is important that supervisory training include basic leadership skills such as setting clear standards, addressing employee problems promptly, and using the probationary period, performance counseling, discipline, and other management tools conscientiously. These interventions can keep difficult situations from turning into major problems. Supervisors are not expected to be experts in dealing with violent behavior but need to know which experts to call, and be committed and willing to seek advice and assistance from those experts. The following are areas that are included in supervisory training:

- Ways to encourage employees to report incidents in which they feel threatened for any reason by anyone inside or outside the organization
- Skills in behaving compassionately and supportively towards employees who report incidents
- Skills in taking disciplinary actions
- Basic skills in handling crisis situations
- Basic emergency procedures, including who to call and what support resources and services are available
- Appropriate screening of pre-employment references
- Basic skills in conflict resolution

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As part of our Security and Workplace Violence Program, training is provided:

- At the time of initial assignment, and annually thereafter
- Whenever new security issues are identified
- Whenever new workplace violence practices are introduced

10.3.6 Recordkeeping

The following records are maintained on file:

- This Security and Workplace Violence Program document
- A copy of all records reviews, physical reviews, employee surveys and corrective actions (retention – 3yrs)
- Written training records for each employee detailing the extent of training received and the date it was received (retention requirements: duration of employment)

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11.0 EMERGENCY ACTION PLAN

11.1 Purpose

The purpose of our Emergency Action Plan is to protect the life and safety of employees in the event of an emergency (emergency = fire, explosion, bomb threat, tornado, severe thunderstorm, hurricane, earthquake).

11.2. Program Administrator

The Administrator of our Emergency Action Plan is:

The Program Administrator is responsible for assuring that the following activities are completed within the OSHA required timeframes, and conform to the specific requirements, including documentation.

- Establishing procedures for reporting an emergency
- Establishing general evacuation and personnel accountability procedures
- Establishing hazard-specific evacuation and personnel accountability procedures
- Establishing procedures for employees who must remain to operate critical functions before evacuation
- Identifying staff trained and certified in CPR and First Aid
- Training employees
- Recordkeeping

11.3. Procedures

Seven types of activities are required to meet the OSHA standard:

- Establishing procedures for reporting an emergency
- Establishing general evacuation and personnel accountability procedures
- Establishing hazard-specific evacuation and personnel accountability procedures
- Establishing procedures for employees who must remain to operate critical functions before evacuation
- Identifying staff trained in CPR and First Aid
- Training employees
- Recordkeeping

11.3.1. Emergency Reporting Procedures

The general procedures for reporting an emergency are as follows:

- Whoever discovers that an emergency is occurring, or may occur, is responsible for reporting the emergency. A first step is to call 911. Additional Emergency Phone Numbers will be posted by in a communal area(s)
- The person reporting the emergency must also notify management and other staff members, so that further steps (e.g. evacuation, moving to safe areas, using an extinguisher, etc.) may be taken
- All employees and visitors should be notified verbally unless a suitable alarm system is available

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11.3.2. General Evacuation Procedures

A. Map of Building(s) and Evacuation Routes

For emergency evacuations, floor plans or workplace maps that clearly show the emergency escape routes and rally point locations are posted. All employees will be instructed as part of our New Employee Orientation program what actions they are to take in various emergency situations that may occur in the workplace.

The floor/workplace plan(s) are reviewed with employees initially when the plan is developed, whenever the employees' responsibilities under the plan change, and whenever the plan is changed.

A Facility Map and Emergency Escape Routes and Designated Safe Areas are located as **Appendices O** and **P**. The map will be posted in each area of the facility.

B. Evacuation

If necessitated by a fire emergency or other internal emergency, the following procedures, intended to be complementary to any evacuation procedures established by a building manager, will be followed:

- The Program Administrator or designated associate will determine whether or not an evacuation is necessary. If an evacuation is warranted, the appropriate alarm will sound
- Upon notification of an evacuation, all employees must exit the building, check wind direction and proceed to the nearest designated safe area, at least 100 feet upwind of the hazard. The Program Administrator or designated associate is responsible for retrieving the visitor registration book and bringing it to the designated evacuation station

Appendix Q is a formatted Employee Responsibility List that indicates employees responsible for assisting other employees, visitors, and/or contractors in the evacuation, and checking to make sure all individuals are evacuated.

C. Evacuation of "Special Needs" Individuals

Special considerations will be given to employees and visitors who may have disabilities or limitations that could impair their ability to self-evacuate during an emergency. In these cases, employees are assigned to assist them in the safe evacuation of the facility if a emergency dictates.

The following procedures should be used to assist individuals with special needs:

Mobility Impaired (Wheelchair)

Employees using wheelchairs should stay in place, or move to an area of refuge with their assistant when the alarm sounds. The evacuation assistant will then proceed to the evacuation assembly point outside the building and tell emergency personnel the location of the person with disability. If the person with a disability is alone, he/she should phone 911 with his/her location, need of assistance or the area of refuge to which they are headed.

Mobility Impaired (Non-Wheelchair)

Employees with mobility impairments, who are able to walk independently, may be able to negotiate stairs in an emergency with minor assistance. If danger is imminent, the individual should wait until the heavy traffic has cleared before attempting the stairs. If there is no immediate danger (detectable smoke, fire, or unusual odor), the person with disability may choose to stay in the building, using the other options, until emergency personnel arrive.

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Hearing and Visually Impaired

Many buildings are equipped with fire alarm horn/strobes that sound the alarm and flash strobe lights. The strobe lights are for hearing-impaired persons. Persons with hearing impairments may not notice or hear emergency alarms and will need to be alerted of emergency situations. In this case, designated employees should assist in the proper notification of a building emergency.

The horn is for sight-impaired persons. Most people with a visual impairment will be familiar with their immediate surroundings and frequently-traveled routes. Since the emergency evacuation route may be different from the commonly traveled route, persons who are visually impaired may need assistance in evacuating. In this case, designated employees will assist in their guidance through the evacuation route.

Shelter-In-Place

During certain emergency situations, particularly external threats (including weather, chemical spills, etc), you may be advised to “Shelter in Place” rather than evacuate the building.

- Go or stay inside the building
- Do not use elevators
- Shut and lock all windows and doors
- Turn off the heat, air conditioning or ventilation system, if you have local controls for these systems
- Quickly locate supplies you may need, e.g., food, water, radio, etc.
- If possible, go to a room or corridor where there are no windows. In the event of a chemical release, go to an above-ground level of the building, since some chemicals are heavier than air and may seep into basements even if the windows are closed
- If possible, monitor for additional information via the NOAA Radio or television for further instructions
- When the “all clear” is announced
 - Open windows and doors
 - Turn on heating, air conditioning or ventilation system
 - Go outside and wait until the building has been vented

11.3.3. Employee Headcount Procedures

We will maintain a daily staff work schedule of all employees, including those who may be off-site. This list will also include the names and location of any contractors that may be on site at any given time. This list will be updated with each new employee hired and non employees will be deleted.

To ensure that all employees have safely evacuated, the following headcount procedures should be followed:

- The Program Coordinator or a designated associate, is responsible for conducting the headcount by having all employees report to predetermined rally-points. Each employee must orderly call out his/her name the Program Administrator or designated associate will check off those reporting on the roster. The Program Administrator or designated associate must verify that all visitors and contractors have left the facility by utilizing the visitor registration book as the roster. Upon completion of the headcount, the Program Administrator or designated associate will notify emergency personnel of any missing employees
- Any individual who is aware of an employee who is out on sick leave or away from facility for any reason must report this a supervisor, the Program Administrator or designated individual during the headcount

Each supervisor is responsible for accounting for all assigned employees, personally or through a designee, by having all such employees report to a predetermined rally point or tornado shelter and conducting a head count. Each employee must be accounted for. All supervisors are required to report their head count (by name) to the Emergency Evacuation Coordinator. A summary of the evacuation rally points and tornado shelters, together with the identities of supervisors and assigned employees who must report to each, is also given in **Appendix P**.

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1. Rally points have been established for all evacuation routes. These rally points are designated on each emergency evacuation procedure floor plan.
2. All supervisors and employees must report to their designated rally points immediately following an evacuation.
3. Each employee is responsible for reporting to his or her supervisor so that an accurate head count can be made. Supervisors will check off the names of all those reporting and will report those not checked off as missing to the Rally Point Coordinator or the Emergency Evacuation Coordinator.
4. The Emergency Evacuation Coordinator will determine the method to be utilized to locate missing personnel.
5. Employees are to remain at the designated rally point until give the “All Clear” signal has been given by the Emergency Evacuation Coordinator, Fire Marshall or other authority having jurisdiction.

Government and Private Agency Coordination

The extent of involvement, if any, by government agencies (i.e. fire, police, etc.) and/or private organizations (i.e. hospitals, telephone, company, etc.) in an emergency, will depend upon the type and magnitude of the crisis.

11.3.4. Hazard-Specific Evacuation and Personnel

Accountability Procedures

A. Fire & Explosions Procedures

In the event that an employee discovers a fire, explosion, or visible smoke, he/she should:

- Go to nearest phone and call 911 or see that someone else calls the fire department. Notify management. Do not try to put out the fire before notifying someone
 - Stay on the phone until you give the fire department all the necessary information, such as the address, location of the fire in the building, type of fire (chemical, wood, etc.), how it started, whether medical assistance is needed, phone number, etc.
 - The person calling the fire department is responsible for informing management of the situation and that the fire department has been notified
 - Management will be responsible for deciding if a total evacuation of the facility is necessary (Refer to Evacuation Procedures). If evacuating, notify other exposed employees immediately
- Attempt to extinguish a small fire, but only if there is backup support and only if trained in the proper use of the extinguisher
- If attempting to extinguish a small fire, maintain a safe distance and use the PASS technique (Pull the pin, Aim low, Squeeze the lever, Sweep from side to side)
- All employees should immediately exit the building using the nearest exit. Employees must meet at the designated place and the Program Administrator or designated associate will perform headcount procedures
- Employees must not leave or re enter the building unless directed to do so by management, the Program Administrator or the fire department
- The employee closest to a hearing impaired employee is responsible for informing the employee of the fire/explosion emergency
- The Program Administrator or designed associate is responsible for meeting the fire department or other responders when they arrive
- Those employees trained in first aid are responsible for giving immediate first aid to injured employees

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B. Sabotage / Bomb Threats

Sabotage is defined as any deliberate action by an individual or group designed to cause harm to personnel, damage equipment, or disrupt normal operations.

- All employees must immediately report suspected acts of sabotage to management
- Since the results of an act of sabotage are the same as those resulting from accidental events (i.e., fire, explosion, spill, etc.), similar response procedures are to be used as appropriate

If a bomb threat is received by telephone:

- the person receiving the call is to attempt to gain as much information as possible, including:
 - All information about the device itself, including set time, type, description, location, etc.
 - Reason for making the call (angry with company, extortion, etc.)
 - Any information about the caller (apparent age, voice characteristics, speech, language, accent, manner, use of unusual terms)
 - Any information of the location of the caller (inside or outside a building, background noises, etc.)
- The person receiving the threat should then contact management
- If management is not available contact the police department immediately. The police department will advise the on the next course of action

Searches are to be conducted by police with the assistance of personnel who are most able to spot “out-of -place” items. Only police personnel are to handle a suspected device.

C. Tornadoes/Severe Thunderstorms

The following procedures should be utilized in the event of a tornado/severe thunderstorm.

- Employees will be notified by management
- Upon notification of the warning, shut off all equipment and non-essential utilities
- Close all doors and windows to the outside
- Proceed to the nearest safe area
- Proceed to the lowest level possible
- Seek shelter in designated safe areas in ground level interior – rooms, restrooms, or hallways away from windows.
- Once in safe area, stay low to the ground and protect your head and neck from possible flying debris
- A disaster kit(s) should be available in the designated safe areas

If no advance warning is received, employees are to attempt to seek shelter in one of the designated safe areas. If this is not possible, employees should seek shelter under a table, desk, or heavy piece of equipment which offers protection from falling debris.

The Program Administrator or designated associate will begin headcount procedures.

The Program Administrator or designated associate will monitor the radio for updates on the weather conditions.

D. Floods

When warnings of impending flood conditions are received via weather broadcasts, U.S. Weather Service, or the police/fire department, the following steps should be taken:

- Move all movable equipment to any elevated areas
- Check outside areas for equipment and materials that could be damaged by floodwaters
- If time allows, construct sandbagged dikes to protect high-risk items

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E. Major Earthquakes

During an earthquake, all employees, visitors, and contractors should evacuate buildings and proceed to areas away from walls, windows, or power lines. If evacuation is not possible, employees are to seek shelter under a desk, table, etc., or in doorways that offer protection from falling objects. After the initial quake, aftershocks should be expected.

F. Power Outages

Power outages can occur for just a few seconds, or a few hours. In all cases the following procedures apply:

- If a power outage lasts more than a few seconds, stop what you are doing. Wait for your eyes to adjust if you are in an area that has no natural illumination or if you have trouble seeing
- Turn off any power tool as it might “spring” back into action once power is restored
- If power outage is due to bad weather, and power will not be restored immediately, make your way to a designated safe area and await further instructions from the Program Administrator or Safety Coordinator

11.3.5. Staff Trained in CPR and First Aid

A list of personnel trained and certified in CPR and First Aid is maintained in **Appendix R**.

11.3.6. Critical Facility Operations

OSHA requires employers to establish procedures for personnel who remain behind for critical facility operations. A list by personnel name/job classification and critical operations will be maintained. As soon as the shutdown is completed, the employees who performed critical facility operations must take the nearest exit route in accordance with general emergency procedures.

Name / Title	Critical Operation

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11.3.7. Employee Training

Training and information is critical to the effectiveness of an emergency plan. All employees are trained on the following:

- Evacuation Plans
- Alarm Systems
- Reporting procedures for personnel
- Shutdown procedures
- Type of emergencies

Training is provided at the following times:

- Initially, when the plan is developed,
- For all new employees,
- When new equipment, materials, or processes are introduced,
- When procedures have been updated or revised,
- When exercises show the employee performance must be improved, and
- At least annually.

11.3.8. Recordkeeping

We maintain the following records on file:

- This Emergency Action Plan document
- A copy of all inspections, results, and corrective actions (retention requirement: 1 year)
- Facility maps detailing emergency escape routes (must also be posted)
- A listing of designated safe areas (must also be posted)
- Emergency telephone numbers (must also be posted)
- Written training records for each employee detailing the extent of training received and the date it was received (retention requirements: duration of employment).