

## Injury and Illness Prevention Program

This Injury and Illness Prevention Program is for \_\_\_\_\_ (*person's name*). It applies to all our work operations.

\_\_\_\_\_ (*person's name*) will be responsible for the overall direction of the safety program.

### Introduction

Our program's objective is to preserve the health and lives of employees. We do this through:

- Preventing injuries and illnesses.
- Promoting safe and healthy work conditions and practices.

We have issued this program to improve safety on the job. We can prevent many injuries and work-related diseases by common sense attention to basic safety practices. Ideally, we want to prevent injuries and illnesses before they happen. But if they happen, we will take whatever actions are necessary to make sure they don't happen again.

There is a direct relationship between safety and the continued success and well-being of any organization. Management's commitment and employees' responsibility are both necessary for this program to be successful. We must recognize that injury and illness prevention and control of accidents results from management and employees working together for a common objective.

The leadership for such an effort must originate with management. The degree to which every level of management accepts this responsibility will determine the success or failure of the entire program.

We must have equal commitment from our employees if this program is to be successful. Employees must assume personal responsibility for safety, both to themselves and fellow workers.

### Program Responsibility

The person with overall responsibility for implementation of this Program is the company's \_\_\_\_\_ (*person's title*). \_\_\_\_\_ (*person's name*) has designated \_\_\_\_\_ (*person's name*) to coordinate the program on a day-to-day basis.

### Code of Safe Practices

All executive, administrative and supervisory employees are responsible for:

- Administrating safety rules and practices.
- Observing safety rules and practices in the work areas and jobs that are under their control.
- Consulting the safety director, or another source, for the answer if unsure about required safety rules or procedures.

The safety director is responsible for:

- Acting as the company's representative in the day-to-day coordination of company safety activities.
- Knowing applicable safety and health laws and regulations.

- Knowing the appropriate means and methods for maintaining a safe and healthy workplace.
- Advising both management and employees when necessary or desired.
- Maintaining:
  - Safety records.
  - Accident investigation.
  - Safety award programs.
  - Safety meeting coordination.
- Interpreting safety rules.
- Arranging for on-the-job employee medical treatment when necessary.
- Specifying safety and protective equipment.
- Specifying safety requirements for tools.

Supervisors are responsible for:

- Planning the job.
- Applying the correct safety methods and equipment.
- Seeing that employees are equipped with proper and adequate tools and safety devices.
- Making sure all needed precautions and protections are taken.
- Watching and guiding the work in progress.
- Knowing what actions to take in emergencies.
- Seeing that employees are capably supervised.
- Making sure employees possess the necessary training, education, skills and qualifications to perform their assigned tasks in a safe and healthy manner.
- Providing appropriate employee training.
- Performing all work in accordance with all applicable federal, state and local occupational safety and health laws, rules and regulations.
- Resolving any problems with their immediate supervisors.

Employees are responsible for:

- Knowing the basic rules set forth in this program.
- Knowing the specific laws, rules and safe practices that apply to their jobs.
- Using good judgment and common sense during their employment with this company.
- Keeping their minds on the jobs at hand.
- Knowing proper safety methods of their jobs.
- Complying with the occupational safety and health standards.
- Complying with all rules, regulations and orders applicable to their actions and conduct.
- Not doing work for which they are not qualified.
- Not doing work which is not performed in accordance with laws and applicable safety methods and conditions.
- Not exposing themselves or anyone else to hazards at any time.
- Resolving any problems with their immediate supervisors.
- Immediately reporting to their supervisors if:
  - They are uncertain about anything mentioned in this program.
  - They are uncertain about safety methods and procedures for performing any work.
  - They believe they are not fully qualified for job assignments.

All employees, including staff and supervisors, must immediately report to their supervisors:

- Anything they believe to be an occupational safety or health hazard.
- Any injury or illness they think is the result of working at this company.

### **Training Requirements**

We want to observe safe and healthy work practices all the time. We require each employee to have the necessary skills, training and education for his or her job. We will conduct regular inspections and observations of employees' work. We want to identify and recognize those who are complying with safe and healthy work practices. We also want to instruct or discipline those who are not doing so.

Supervisors must:

- Be familiar with any job safety or health hazards that their employees may be exposed to.
- Provide the necessary job safety training for employees.
- Ensure that, at the time this program is first adopted, their employees are aware of all job hazards.
- Ensure that employees are able to properly perform each of their job assignments in accordance with all applicable health and safety requirements and protective measures.
- Provide new employees, or employees given a new/different job, the proper training and education necessary before beginning the job.
- Provide training when:
  - New substances, processes, procedures or equipment are introduced to the workplace that produce a new hazard.
  - A new or previously unrecognized hazard is disclosed.
  - The statements, action or conduct of any employee shows the employee needs additional instruction, education or training.

### **Discipline for Noncompliance**

We will take disciplinary action against any employee who:

- Fails to observe any established job safety or health rule, practice or order.
- Fails to comply with any restriction, limitation or obligation of this program.
- Acts in a way that creates or continues a condition or practice that is hazardous to himself or herself, or to anyone else.

Any foreman, supervisor or official of management, as soon as he or she becomes aware of any such infraction, shall initiate these actions:

1. **First Offense:** Write a report of the incident and place it in the employee's personnel file. The employee must undergo additional instruction or retraining before he or she can continue to work.
2. **Second Offense:** Immediately suspend the employee from employment without pay for \_\_\_\_\_ (number) days. Write a report of the incident and place it in the employee's personnel file. Upon the employee's return to work, he or she must undergo additional instruction or retraining before resuming work.
3. **Third Offense:** Immediately terminate the employee.

Any employee who has been disciplined but not terminated under the above rule may have a first or second offense eliminated from their record after \_\_\_\_\_ (number) months without any further infractions.

We will not permit any employee or supervisor with job safety or health authority to keep that authority if they fail to properly discharge it. We can only restore that authority when the employee or supervisor demonstrates that he or she is once again able to properly discharge such authority.

### **Enforcement**

Each matter covered in this program is inter-related. Each person must:

- Comply with all procedures, rules and regulations.
- Comply with all orders that are applicable to his or her own actions and conduct.
- Take appropriate action when noncompliance occurs.

We will look for the cause of all reports and instances of noncompliance. We will promptly put into effect whatever action is necessary to prevent similar instances in the future.

### **Communications**

It is company policy to effectively communicate applicable and required health and safety matters to our employees in language they understand. We do this through:

- Education and training.
- Meetings, whenever they are appropriate.
- Posting and distributing written communications.
- Immediately reporting:
  - Job safety or health hazards.
  - Work-related injuries and illnesses.

Each supervisor is responsible for ensuring that each employee or other person under the supervisor's immediate direction fully understands:

- Relevant job hazards.
- Health and safety requirements, precautions and protective measures.

Any employee who does not understand these must immediately report that to his or her superior.

Whenever it is necessary or useful, we will hold a safety meeting to discuss health and safety concerns and receive necessary instruction and training. We will also hold a meeting when a law, regulation or company policy requires it.

We will prominently place the OSHA workplace poster "Job Safety and Health Protection" (or its state equivalent) at all times. And from February 1 to March 30 of each year, we will prominently place the annual summary of all recordable injuries and illnesses.

No employee shall be discharged, disciplined or discriminated against in any manner for:

- Reporting any hazardous condition or practice.
- Reporting any occupational injury or illness.
- Complaining of any occupational safety or health conditions.
- Exercising any legal right regarding safety concerns.

Employees may anonymously report hazardous conditions, hazardous practices or infractions of any provision of this program. Employees may do so as permitted by law. They may mail or submit to the safety director or our chief executive officer an unsigned, written statement.

We encourage each employee to suggest and recommend ideas for improving job safety and health conditions. Employees can submit their ideas to their immediate supervisors or the safety director.

We will recognize and award any ideas we deem to be helpful or worthwhile. The safety director will develop programs to do this. Each supervisor must be constantly on the lookout for employees who consistently observe the job safety and health rules and requirements in a way that they can be examples for others. Supervisors should identify deserving employees and recognize and reward them. Each supervisor will consult with the safety director on all recognition and award activities, programs and suggestions.

### **Worksite Analysis and Inspections**

We recognize that no policy, rule or requirement can be fully effective unless it is observed. Therefore, we frequently analyze and inspect workplace conditions and practices. We make sure employees report hazards immediately. We also make sure employees promptly correct or abate hazards.

When this program begins, and at least annually after that, the safety director will conduct a worksite analysis to identify all:

- Existing hazards.
- Conditions, practices and operations that create hazards.
- Areas where hazards may develop.

The safety director may designate someone else for this task. The company may choose outside consultants for this task. Or, OSHA may assign outside consultants from its approved consultation programs.

The annual worksite analysis will:

- Review and analyze all:
  - Relevant injuries and illnesses.
  - Medical, insurance, accident and related records.
- Identify job injury and illness patterns.
- Identify any apparent trends relating to particular:
  - Departments.
  - Processes.
  - Operations.
  - Employees.
  - Occupations.
  - Workstations.

Regular hazard inspection will make sure:

1. Each supervisor maintains surveillance of the work under his or her immediate control.
2. Employees and others are performing and assisting in the work.
3. Each employee is constantly on alert for potential hazards and is immediately reporting them to his or her supervisor.

4. Each supervisor is taking the appropriate investigatory and hazard abatement actions as soon as he or she becomes aware of a hazardous condition or practice.
5. Each supervisor promptly conducts a special inspection when aware of a potential hazard in the area, condition, equipment, substance, material, employee or process under the supervisor's responsibility. He or she is responsible for getting assistance when necessary to identify the source or cause of the hazard, or to effect appropriate corrective action.
6. The safety director conducts both regular and unannounced inspections either personally or by someone designated by him or her.

We will also conduct special inspections as necessary and whenever our insurance carrier or any others desire. We want to ensure a safe and healthy workplace.

### **Injury/Illness and Accident Investigations**

We must investigate all accidents and "near miss" incidents that occur on our premises. We do this whether or not the accidents resulted in injury or illness. We also investigate all reports of work-related injuries or illnesses to company employees.

The immediate supervisor of any employee who is reported to have sustained a work-related injury or illness is responsible for assuring that it is promptly investigated. The supervisor shall report each accident to the safety director. If the safety director gives his or her approval, the supervisor may conduct the investigation personally or may assign another person (or persons) to conduct all or part of any such investigation.

The safety director has overall responsibility for the prompt investigation of each accident and "near miss" incident that occurs on the premises. He or she will make sure an appropriate investigation has been (or is being) conducted. The safety director will either conduct the investigation personally or have it conducted by some person designated by him or her or authorized by this program or by applicable law or regulation.

Each investigation will include the execution of written reports, interviews, statements and questionnaires required by:

- Our company.
- The program.
- Concerned insurance carriers.
- Local, state, or federal laws or regulations.

### **Hazard Abatement**

The purpose of the rules and procedures for conducting worksite analysis, surveillance, inspections and investigations, as well as making prompt reports of hazards, is the corrections of hazardous conditions and practices before they cause injury, illness or additional damage. Our company policy is one of prompt hazard abatement in every situation.

The supervisor responsible for the area, process, condition, equipment, substance, material or employee who is the cause, source or location of the hazard, is responsible for its immediate abatement. The supervisor must:

- Correct the condition.
- Remove employees and all others from the zone of danger.
- Suspend all work.
- Ensure that the condition will not cause additional injury or illness.

When the supervisor is unable to effect immediate abatement of a hazard, he or she will promptly get the needed assistance from whatever source is able to furnish it.

We permit only those properly trained and equipped for necessary rescue and medical procedures, or correction of the condition constituting the hazard, to enter or remain present in any place where a hazardous condition exists that is likely to cause death or serious physical harm.

### **Records and Reports**

It is our policy to get and keep written, electronic and photocopied reports, records and other documents of the steps we have taken to implement and maintain this program. The documents we keep for this program are for:

- Work-related injuries and illnesses.
- Work-related hazardous substances and conditions.
- Employee training and qualifications.
- Disciplinary actions, investigations, inspections and other matters.

We keep these documents to:

- Comply with all applicable laws and regulations.
- Establish and document accountability.
- Serve as a useful reference.
- Delineate a benchmark for auditing.

We will be consistent with applicable constitutional and statutory doctrine and privacy requirements. We will create, maintain, furnish or supply, as required, all records, documents, reports, notices or warnings required by applicable federal, state or local law or regulation. This also includes those that any such authority, concerned insurance carrier or appropriate company official requests.

We will make a written or photocopied record of all employee training activities and required safety meetings. The record will show as a minimum:

- The calendar date or dates thereof.
- The name of employees participating.
- The purpose or reason for which it was conducted including the type of training and the training provider.

We will retain these records for three years.

We will retain written reports of job safety and health hazards. We will investigate each report and will make a written report of the results of the investigation and the action taken on the report.

We will maintain a record of each worksite analysis. We will retain each record for three years. Each record will include:

- The name of the person or persons who participated in it.
- The calendar date or dates of its conduct.
- Each area, process or other aspect of the work that it covered.
- The deficiencies noted (if any).
- The corrective action taken (if necessary).

- The plans and recommendations for improvements in workplace safety and health programs, practices and conditions.

We will make (and keep for three years) records of the scheduled and periodic inspections that we conduct. We will do this to identify unsafe conditions and work practices. Each record will show, at a minimum:

- The name of the person or persons conducting the inspection.
- The unsafe conditions and practices identified (if any).
- The action taken to correct or abate those unsafe conditions and practices if necessary.

We may record electronically or photograph any records, reports, documents and other matters that this program requires. We will keep this data in some other fashion so it is readily available.