

Injury and Illness Prevention Program (IIPP)

Scope and Application

This document outlines key elements of a comprehensive Injury and Illness Prevention Program (IIPP).

Mission:

Our mission is to provide a safe and healthful work environment for all employees and to prevent injuries and illnesses by establishing a positive safety culture. Safety is considered a priority and equal in importance to production and quality. It is not acceptable for any employee to get injured on the job. We must do everything possible to prevent injuries from occurring in the first place.

The success of the IIPP is dependent upon the support by all management personnel and employees. All managers and employees must work toward continuous improvement in our safety program with an ultimate goal of zero incidents. The IIPP provides a framework for making this goal a reality.

Goals of the IIPP include:

- Developing, implementing, and managing an effective safety program to assure a safe, healthful, and productive workplace and compliance with applicable state and federal regulations
- Developing an incident-free work environment and a place where employees feel valued
- Encouraging the responsibility and participation of all employees and management in the organization's safety efforts
- Providing ongoing safety training to employees and management so that an understanding of hazards and respective safety requirements are established and supported.
- Minimize workers' compensation and other insurance costs.

A copy of this IIPP is located here: _____

For this facility and operation, the following person will lead the development, implementation, and updating of the IIPP and safety programs which are a part of the IIPP:

[Name] _____ [Title] _____

Thank you to all employees for your efforts in making our safety program a success.

[President's Signature]

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1. Roles and Responsibilities

Employee responsibilities and rights:

Employees are expected to actively participate in the organization’s IIPP, which includes the following responsibilities:

- Follow safety and health procedures, including:
 - General safety rules as stated in Appendix A: General Safety Rules.
 - Protective measures outlined on the job hazard analyses (JHAs) and in training.
 - Standard operating procedures and JHAs.
 - The organization’s drug and alcohol policy.
 - Applicable standards of the Occupational Safety and Health Act (OSH Act).
- Learn about the potential hazards in your workplace.
- Immediately report all hazardous conditions, injuries, and near misses to management or a safety committee representative.
- Provide recommendations to your department’s safety committee representative for improving the safety and health of the work environment.
- Cooperate with workplace inspections and incident investigations.

Employee responsibilities and rights (continued):

- Understand your rights under this IIPP:
 - The right to a safe and healthy workplace
 - The right to refuse to do hazardous work

- The right to have written information about hazards in the workplace (for example, SDSs)
- The right to report hazards to your employer or OSHA
- The right to ask OSHA to conduct an inspection
- The right to complain to OSHA if you experience retaliation by your employer
- The right to view any citations issued by OSHA to your employer
- The right to obtain a copy of the record of harmful substance exposures and a copy of your medical records

Management responsibilities:

Management is responsible for implementing and maintaining the IIPP in their work areas and for encouraging employee input regarding safety issues and possible corrective actions.

All employees, including management, are responsible for complying with safe and healthful work practices, actively participating in the safety program, and implementing all directives, policies, and procedures.

Management must do the following to promote compliance and a good safety culture:

- Post OSHA's "It's the Law Poster" in the workplace.
- Comply with applicable standards of the OSH Act
- Inform employees of the provisions of the IIPP and ensure understanding.
- Model and enforce safe work practices for employees and everyone in the work area.
- Communicate with all employees about occupational health and safety on an ongoing basis, including conducting routine employee meetings to discuss current safety issues.
- Encourage employees to report hazardous conditions, injuries, near misses, and all incidents.
- Assure that positive incentives are in place for continued safety performance and adherence to safety rules. Refer to your organization's performance review process.
- Follow disciplinary procedures for employees or management who disregard workplace safety requirements. Refer to your organization's disciplinary process.
- Train employees in the hazards and respective controls associated with their work area.

Management responsibilities (continued):

- Encourage employee involvement in safety committees, and assure that members attend.
- Provide recommendations for improving the safety and health of the work environment to the safety committee or upper-level management.

- Assure resolution of safety issues discovered through incident reports, the safety committee, or inspections in a timely manner using Appendix B: Safety Action Plan.
- Assure periodic, documented inspections of workspaces.
- Conduct performance reviews for employees and managers that include safety performance. The reviews include adherence to the safety rules and procedures outlined in JHAs and emphasize the positive contributions which employees have made to the safety program.
- If given citations by OSHA, correct the hazards by the given deadline.

Safety committee member responsibilities:

- Attend and actively participate in all safety committee meetings.
- Before safety meetings:
 - Actively and routinely solicit safety suggestions from employees.
 - Conduct a departmental walk-through on the day of the safety committee meeting (or the day before) and report any safety issues at the safety committee meeting.
- Keep your department informed of safety committee agenda items, findings, and current safety topics.
- Conduct quarterly, walk-through safety inspections for each department.
 - Identify any hazards and recommend any needed safety improvements.
 - For hazards identified, record in the Safety Action Plan corrective actions to be taken, the person responsible for implementing the corrective actions, and the targeted completion date. See Appendix B: Safety Action Plan.
 - Post and distribute reports to management.
- Review and improve upon existing safety policies and programs.
- Participate in incident investigations.

2. Communication

Open communication about safety must flow both ways, from management down to employees and from employees up through management channels.

Safety communications can include the following:

- Reporting of incidents and near-misses by employees to management.
- New employee orientation, including a discussion of safety and health policies and procedures

- Review of the IIPP
- Training programs covering JHAs and safety programs and applicable State and Federal regulations
- Open discussion about safety at departmental meetings
- Employee communication through departmental safety committee representatives to the central safety committee
- Posted, distributed, and accessible safety information, such as OSHA posters, safety data sheets (SDSs), and written safety programs
- Safety suggestion forms, which are available for employees to report any hazardous conditions or issues (anonymously, if needed)

3. Hazard Identification and Assessment

JHAs and inspections will be used to identify and evaluate workplace hazards.

Job Hazard Analysis (JHAs):

JHAs analyze each job step to identify uncontrolled hazards and establish controls to address these hazards. Conducting JHAs helps you to reduce the likelihood of incidents and injuries in the workplace. Involve employees and gain their input throughout the process.

The JHA process:

- Break down jobs into their steps or job tasks.
- Identify existing hazards in each job step and consider what controls will work to resolve them.
- Set priorities for correcting identified hazards.
- Review and analyze past safety incidents to identify trends.

Inspection types:

- **Safety committee inspections:** Safety committee members will conduct periodic inspections to identify and evaluate workplace hazards. Safety committee members must also solicit input from employees regarding hazards in their work areas and assess and document them completely.

- **Management inspections:** Department managers will conduct safety observations of employee work practices and periodic hazard inspections in their departments or other departments. They must perform periodic hazard inspections:
 - At least **monthly**.
 - When new substances, processes, procedures or equipment which present potential new hazards are introduced into our workplace.
 - When new, previously unidentified hazards are recognized.
 - When occupational injuries and illnesses occur.
 - When workplace conditions warrant an inspection (e.g., when an unusual maintenance task is to be conducted).
- **Employee inspections:** Employees will assist in performing routine safety inspections as directed by management.

Reports and documentation:

- All inspectors must:
 - Document all inspections, include safety issues and exemplary safety behaviors.
 - Propose corrective actions in the Safety Action Plan. See Appendix B: Safety Action Plan.
 - Report all results to the team and to the **[Responsible Person]** who are accountable for taking follow-up actions, if needed.
- Management-level inspectors must develop a maintenance work order for each safety issue to be corrected and assign it an appropriate priority.

Communicating the results:

Management must:

- Communicate the results of any inspections or safety observations to employees, informing them of any hazards identified.
- Outline areas for employee improvement, if needed.

4. Incident Investigation

All near misses and incidents must be reported to management and investigated using the Incident Investigation Policy and procedures.

The investigation team:

Management is responsible for overseeing the investigation process following an incident involving an employee in their departments. The investigation team is normally established at

the time of the incident depending upon where the incident occurred, during which shift it occurred, and who needs to be involved.

The team leader must:

- Include both management and employees in the investigation.
- Make sure that the investigation team includes or has access to technical expertise in safety, engineering, operations, or any other subjects that may be helpful.

The investigation:

The investigation must be done immediately. The goals of the investigation are to identify the root causes, identify corrective actions to address the root causes and eliminate further hazards, and put them into place as soon as possible.

The team must:

- Identify hazards, root causes, and corrective actions.
- Document investigation results in the Safety Action Plan and retain these records.
- Inform management of the results of the investigation so they can take appropriate action.

5. Hazard Correction and Control

Management is responsible for implementing a plan to prioritize the hazards to be controlled, to correct and control the hazards, and assure that the corrective actions are effective and sufficient.

[Responsible Person] will assign competent persons to do the following:

- Document and track all actions taken to correct and control hazards in the Safety Action Plan.
- Prioritize corrective actions so that safety-related issues are addressed promptly.
- Review the JHA to assure the hazard has been adequately addressed or develop a new JHA if needed.
- Assure that affected employees are aware of all noted hazards and plans to correct them.
- If results may be beneficial to other parts of your organization, share them once issues have been verified as adequately resolved.

5. Hazard Correction and Control (continued)

Specific procedures used to address hazards can include:

- Eliminate the hazard entirely if possible. (For example, this might involve substituting a hazardous material with a non-hazardous one.)
- Develop engineering controls so that employees will not be exposed.
- Implement administrative controls (e.g., policies and procedures, training, etc.), but keep in mind that they are the second line of defense after engineering controls.
- Supply PPE for employees, but keep in mind that this is a last resort after engineering and administrative controls.
- Assure that interim controls are in place if hazards cannot be controlled immediately. Do what it takes to safeguard staff until permanent controls are put in place.
- Stop any unsafe work practices and provide retraining to employees, if needed.

6. Training and Education

Training related to the IIPP will be conducted by **[Responsible Person]**.

They will assure that all education and training sessions are scheduled and completed as necessary.

Training content:

Training must cover the following:

- The IIPP
- Hazards and controls specific to employees' individual job assignments
- How to protect against those hazards
- Other safety-related programs that are identified in your hazard assessments and are required by OSHA
 - **Note:** See Appendix C: Safety Programs for a list of programs your organization should have.

Training frequency:

Training must occur:

- As soon as possible for new employees
- For employees beginning new job assignments
- For employees being temporarily relocated to another type of machinery or equipment
- When the IIPP is first established
- When a new or previously unrecognized hazard is discovered
- When new substances, processes, procedures or equipment are introduced to the workplace and represent a new hazard
- Periodically, in the form of refresher training

General requirements:

Both employees and management must be trained. Management must be aware of hazards that the employees under their direction may be exposed to.

Training must be conducted in a language and vocabulary trainees understand.

Training must be documented and maintained for at least three years.

7. Program Audit and Improvement

The goal of audits is continual improvement of the program.

- Management will oversee the IIPP audit process.
- Management will audit the facility to evaluate safety conditions and adherence to the JHA process, programs, and procedures.

Auditors will:

- Evaluate the IIPP, including safety and health training, safety evaluations conducted, and existing safety programs to assure they are fully up-to-date and compliant.
- Review the hazard correction and control process to assure that all necessary corrective actions have been taken to control identified hazards.

Auditors will (continued):

- Audit recordkeeping to assure that proper documentation is complete, being done in a timely manner, and properly maintained.
- After performing audits, determine whether the IIPP is working effectively and if it is achieving the safety goals set out by the company. If it is not, auditors will take steps to improve the program where needed.
- Perform a gap analysis (using a trend analysis of losses and a risk assessment) to determine the opportunities for improving your risk management action plan. Prioritize steps to be taken over time to address these opportunities.

8. Recordkeeping Requirements

Management oversees recordkeeping.

Records to be kept:

- OSHA 301, 300, and 300A forms
- Hazard assessment and correction forms, which identify the following:
 - Hazards
 - Work practices and actions taken to correct hazards
 - Safety work orders
 - Action plans
 - Those who conducted the assessments
 - Those responsible for making corrections
 - The target dates and completion dates for corrections
- Employee training and instruction forms for each employee, which include their names or other identifiers, training dates, types of training, and trainer name

Duration:

- Inspection records and training documentation will be maintained indefinitely.
- Any exposure or medical records are to be retained for [] years.

Documentation method:

Documents can be found in [location].

Appendix A: General Safety Rules

Rules for Management

- Require that employees follow every safe work practice.
- Give all employees initial and regular safety training. Give **Monthly** "Toolbox Meetings," which cover a step of the JHA, other Toolbox subjects, or regulatory requirements.
- Supervise work to prevent employee injuries.
- Protect employees from hazards by:
 - Conducting the appropriate hazard assessments, inspections, and audits.
 - Putting controls in place that eliminate or minimize hazards.
 - Establishing written safety programs. See Appendix C: Safety Programs.
 - Training employees in all hazards and safe work practices so that they understand how to protect themselves and others.

Rules for Employees

Preparedness:

- Complete all required training.
- Know and follow safe practices.
- Do not work if when you are impaired with fatigue, illness, or another potential cause for incident or injury.

Safe behaviors:

- Never work under the influence of drugs or alcohol. We are a drug-free work environment. Anyone known to be under the influence of drugs or intoxicating substances that impair their ability to safely perform the assigned duties shall not be allowed on the job while in that condition.
- Report the use of prescription drugs that might cause drowsiness to management at the start of every shift.
- Do not engage in horseplay or any activities that may have an adverse influence on the safety or well-being of other employees.
- Do not crowd or push others when boarding or leaving any workplace vehicle or other conveyance.

Appendix A: General Safety Rules

Safe behaviors (continued):

- Do not run in the workplace.
- Walking or climbing on equipment is prohibited.
- Never walk across any moving parts or place any body part in a hazard zone of machinery or equipment (e.g., a point of operation).
- Never stand under or near any suspended load (e.g., on a crane or lift).
- Do not smoke in any area of our facility.
- Do not enter confined spaces, i.e., manholes, underground vaults, chambers, tanks, silos, or other similar places that receive little ventilation, unless they have been determined safe to enter per the Confined Space Entry Program.
- Never work alone in the facility.
- Never distract a coworker when they are operating equipment.
- Never throw materials, tools, or other objects from buildings or structures until proper precautions are taken to protect others located below from the falling objects.

Emergency and injury response:

- Call "911" in the event of a medical emergency. Then initiate your company's emergency response procedures.
- **[Responsible Person]** assures that if an employee needs medical attention, a Modified Return-to-Work Packet is given to the injured employee to give to the attending physician so that the physician knows about the Return-to-Work Program.
- Report all injuries to management, even if they are not emergencies, so that arrangements can be made for medical or first aid treatment.
- Do not drive yourself if you are injured. Report to management and they will determine the proper means of transportation.
- Evacuate in the event of a fire. If possible, pull the fire alarm and warn those around you as you exit the building. Do not attempt to fight the fire unless you are a trained responder.
- Notify management of any chemical spills or emergencies. **Never** try to clean up a material unless you are properly trained and equipped as part of a hazardous material responder team.

Appendix A: General Safety Rules

Emergency and injury response (continued):

- Never block a fire door.
- Know the following:
 - Your emergency evacuation route.
 - Your assembly point to meet up after an evacuation.
 - The location of emergency evacuation maps, emergency eyewash stations, the closest fire extinguishers, and the closest first aid supplies.
 - Who the first aid providers are.
- First aid providers will provide necessary treatment, monitor the progress of injuries, and assure that injuries are properly treated to the level of their ability.

Other reporting:

- Report all incidents and near misses to management, even if they do not result in an injury.
- Report unsafe working conditions, unsafe practices, or defective tools and equipment to management immediately. Red tag and remove defective tools and equipment from service immediately, so nobody else will use them.

Ergonomics:

Follow safe lifting precautions.

- Lift with your legs, not your back.
- Use neutral posture without twisting or overextending.
- Plan out your route and make sure that it is clear before you begin to carry the load.
- For heavy loads, use material handling equipment whenever possible or obtain help for heavy or cumbersome loads if there is no material handling equipment present.

Housekeeping:

- Keep all exits, aisles, emergency equipment and electrical panels unblocked (36-inch clearance is required).

Housekeeping (continued):

- Help to prevent slip and trip hazards by:
 - Doing a pre-break clean up and keeping your work area organized throughout the day.
 - Responding when you see a hazard rather than just walking on.

Appendix A: General Safety Rules

- Cleaning up clutter and trip hazards from walkways as soon as you see them and at minimum before each break.
- Keeping tools and equipment in their proper places.
- Cleaning up spills of non-hazardous materials right away.

PPE:

- Properly wear all required personal protective equipment (PPE) at all times when you are in the appropriate work area.
- Inspect your PPE regularly for wear or defects.
- Clean PPE after use, and store it in a clean, designated area.
- Wear enclosed-top, anti-slip soled shoes. Do not wear shoes with thin or badly worn soles.
- Do not use compressed air to clean your clothing.

Machine safety, electrical safety, and equipment care:

- If you work around machinery, do not wear loose clothing, have loose hair or jewelry, as they can get caught in the machinery and pull you in.
- Do not handle or tamper with any utilities associated with electrical equipment, machinery, or air or water lines in a manner not within the scope of your duties, unless you are trained, authorized, and utilizing established lockout/tagout procedures for the specific equipment in question.
- Do not remove guards or other protective devices.
- Never operate machinery without guards or safeguards in place. If guards or protective devices are not properly in place or firmly adjusted, report deficiencies promptly to management.
- Maintenance and facilities personnel are the only people authorized and trained to perform work involving lockout/tagout.
 - **Do not** try to repair or de-jam any equipment without authorization.
 - If you are authorized to make repairs, make sure that all equipment is locked and tagged out.
- Shut the machine down prior to leaving the floor and whenever servicing.

Machine safety, electrical safety, and equipment care (continued):

- Report any safety issues or needs to management.

Appendix A: General Safety Rules

- Do not use defective or out-of-specification tool or machinery. It must be immediately removed from service and repaired or replaced.
- Only licensed electricians are authorized to work on electrical equipment. The following rules pertain to electrical equipment:
 - Keep electrical panels closed. Keep the ground intact.
 - Consider all electrical equipment being assembled or tested “live.”
 - Use ground fault circuit interrupters in wet areas.
 - Assure that electrical panels are clearly marked to indicate equipment/circuits controlled by specific breakers.
- When working with electrical hand tools, make sure the ground is intact and that all insulation is sound.

Ladder safety:

When using ladders:

- Utilize the proper type and size of ladder for the job.
- For extension ladders, maintain the 4:1 rule (vertical rise to horizontal slope), and secure the top of the ladder.
- Do not utilize the top two rungs on a stepladder.
- Assure that they are sturdy and in good condition. Immediately red tag and remove from service if this is not the case.
- Fix them in place to assure stability.
- Use three points of contact when climbing.
- Do not carry items (except on a tool belt).
- Only one person may climb the ladder at a time.

Welding:

- Welding and **any** hot work requires the use of a hot work permit, **prior to** starting.
- Unless welding, stay away from welding and grinding areas.
- Assure that welding curtains are used to protect employees working in adjacent areas or walking by.
- Wear safety glasses when any time you are in production areas.

Appendix A: General Safety Rules

Forklift and powered industrial truck safety:

- Do not use a forklift or powered industrial truck unless you are properly certified.
- When in the shop, assume that forklift/pallet jack operators **do not see you**.
- Stay out of forklift/pallet jack corridors as much as possible.
- For certified operators:
 - Only one person at a time is permitted on the equipment.
 - Keep loads low, and keep weights within limits.
 - Wear safety belts during operation.

Chemical use:

- Only use chemicals if you have been trained on their safe use.
- Know the SDS content and location for all chemicals you work with or around.
- Always wear the proper PPE.
- Always add acid to water; **never** add water to acid.
- Always wash hands with soap and water after handling any chemicals.
- **Do not** scratch or rub any part of your body while working with chemicals.
- Assure that all containers are labeled with the identity of the contents and general hazards (following GHS requirements).
- All piping systems must also be clearly labeled with contents, flow, and concentration.
- **Do not** use any chemical unless the container is clearly and correctly labeled.
- **Do not** taste or sniff chemicals, solvents, or any processing solution.

Chemical use (continued):

- **Do not** work alone when handling chemicals.
- Use all chemicals under proper ventilation. Always check ventilation gauges, if present, to be sure of proper function prior to operating/charging.
- Tightly close all chemical containers after use and return them to the proper storage cabinet (i.e., acid, base, peroxide, or flammable).
- Assure that chemical products are stored with compatible chemicals (e.g. avoid storing acids near bases or flammables near oxidizers).

Appendix A: General Safety Rules

- **Do not** store chemical containers on floors; they should be stored in spill containment receptacles that can contain the full capacity of any spill.
- Use proper procedures and labeled waste containers for disposal of all chemicals.
- Eating, drinking, or smoking is not permitted in any chemical use/storage area.

Appendix B: Safety Action Plan

Purpose: Manage and provide accountability for follow-up of all safety-related corrective actions.

1. Include any action related to the Safety Program. Including why you are taking the action will help when prioritizing.

Example Action Items include those which pertain to safety committee tasks, incident investigation follow-up action items, hazard identification findings, employee safety suggestions, behavioral-based safety observations, incident trend analysis, safety training development, reviews of written safety policy and program documentation.

2. A three tier priority system is recommended – High, Medium, Low, or 1, 2, 3. Limiting the number of High priority items keeps your organization focused on next steps. Reprioritize as action items are completed or added.

Action Item ¹	Responsible Individual(s)	Targeted Completion Date	Actual Completion Date	Priority ²

Appendix B: Safety Action Plan

Action Item ¹	Responsible Individual(s)	Targeted Completion Date	Actual Completion Date	Priority ²

Appendix C: Safety Programs

Instructions: Conduct a hazard assessment to discover which safety programs your facility needs. The following is a list of commonly required programs and should be converted into a list of your existing safety programs.

- Bloodborne Pathogens
- Chemical/Substance-Specific Written Programs (e.g., lead, asbestos, silica)
- Confined Space Entry
- Driving Safety Policy for Non-Commercial Drivers
- Electrical Safety
- Emergency Action Plan
- Ergonomics Policy
- Fall Protection Policy
- Fire Prevention Plan
- Fleet Safety Policy – Regulated
- Forklift/Powered Industrial Truck Operation Policy
- Hand Tool Safety
- Hazard Assessment for Personal Protective Equipment
- Hazard Communication/GHS
- HAZWOPER
- Heat Illness Prevention Plan
- Hot Work (including welding, cutting, and brazing)
- Incident Investigation Plan
- Lockout/Tagout Policy
- Medical Services (including first aid/CPR/AED)
- Noise and Hearing Conservation Program
- Personal Protective Equipment (PPE) Program
- Respiratory Protection Program
- Safety Committee Program
- Spill Prevention and Response Plan
- Substance Abuse Policy
- Workplace Violence Prevention Program