# 

# [*Company name*]

# Injury and Illness Prevention Plan (IIPP)

**[*Facility address and phone*]**

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Policy Statement

The personal safety and health of each employee of **[*name*]** is of primary importance. The prevention of occupational injuries and illnesses is of such consequence that safe working conditions and practices will be given precedence over operating productivity whenever necessary.

We will maintain a safety and health program conforming to the best practices of organizations in our industry. Our program will emphasize injury and illness prevention on the part of both management and employees. We promote cooperation in all safety and health matters, not only between management and employee, but also between each employee and his or her co-workers. Only through a cooperative effort can a safety program in the best interest of all be established and preserved.

Our objective is a safety and health program that will reduce injuries and illnesses, and that surpasses the best experiences of other operations similar to ours.

Responsibility

I, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, delegate the responsibility for  
 the administration of this organization’s IIPP to **[*IIPP administrator OR the managers and supervisors who are in charge of employees in their respective work areas*].** Responsibilities   
for protecting the safety and health of all employees are assigned according to the *Plan Administration* section of this IIPP.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**[*Owner or Chief Executive Officer*] Date**

Compliance

Managers and supervisors are responsible for establishing and maintaining good health and safety practices. To ensure compliance, the following procedures will be implemented by managers and supervisors:

**[*Modify the following compliance procedures as applicable to your facility*.]**

* Inform all employees of the provisions of this IIPP.
* Evaluate the safety performance of all workers through job hazard analyses (JHAs), observation, interviews, and periodic testing.
* Recognize employees for following safe and healthful work practices.
* Train employees as necessary to remedy any deficiencies in employee safety performance.
* Take disciplinary actions as appropriate with employees for failure to follow safe and healthful work practices.
* Adhere to an antidiscrimination policy for employees reporting safety and health concerns.

Code of Safe Practices

All employees will comply with general workplace safety practices in addition to any site- or operation-specific work practices. See Attachment **[*number*]** for a copy of the *Code of Safe Practices* checklist.

Disciplinary Action

All employees, including all levels of management, will be held accountable for obeying site safety and health rules. The following four-step disciplinary policy will be applied to everyone by the appropriate level of supervisor:

1. Oral warning
2. Written reprimand
3. Suspension
4. Dismissal

Visitors, including contractors who violate safety and health rules and procedures, will be escorted from the site. Should the disciplined person request a review of the disciplinary action, **[*name*]** will review the situation and make a recommendation to management, which reserves the right for final decision.

Antidiscrimination Policy

It is the policy of this organization not to discriminate against any employee who reports a work-related fatality, injury, or illness, files a safety and health complaint, requests access to injury and illness records, or otherwise exercises any rights afforded by occupational safety and health laws.

Communication

All managers and supervisors are responsible for communicating with all workers about occupational safety and health in a form readily understandable by all workers. Our communication system encourages all workers to inform their managers and supervisors   
about workplace hazards without fear of reprisal.

**[*If your facility employs fewer than 10 workers, you may choose Option 1 and delete the remainder of this Communication section. If you employ 10 or more workers, delete Option 1 and modify Option 2 as applicable to your facility.*]**

**[*Option 1*]**

Our establishment has fewer than 10 employees and communicates with and instructs employees orally about general safe work practices and hazards unique to each employee’s job assignment.

**[*Option 2*]**  
Management ensures that at least several avenues exist for employee involvement in safety and health decision making and problem solving. These avenues include the following communication systems:

**[Modify the following list of communication activities as applicable to your facility.]**

* New worker orientation, including a discussion of safety and health policies and procedures
* Safety committee membership and other ad hoc problem-solving groups
* Safety and health publications
* Confidential hazard reporting
* Serve as safety observers
* Employee training
* Analysis of hazards inherent in jobsites and how to protect against those hazards
* Activity planning to heighten safety and health awareness
* Regularly scheduled safety meetings

Management encourages employees’ involvement and devises appropriate recognition for outstanding employee participation.

**[*Delete the following Safety Committee subsection and attachment reference in the Supporting Documents section if it is not applicable*.]**

Safety committee

This facility has established a safety committee composed of management and employee representatives. See Attachment **[*number*]** for a copy of the *Safety Committee* document.

Safety Meetings

Management will conduct safety meetings for employees **[*frequency*]** and more often to discuss safety issues as they come up. A safety meeting includes all employees in a work area and at least one manager or supervisor to ensure that all appropriate issues are addressed. A manager or supervisor will cover one or more of the following activities:

* Review key safety topics.
* Review safety and health inspection reports to help correct safety hazards.
* Evaluate the accident investigations conducted since the last meeting to   
  determine if the cause(s) of the unsafe situation was identified and corrected.
* Review any observed unsafe practices and ways to correct them.
* Reaffirm the need for safe work practices.
* Answer any questions that employees may have about a safe practice,   
  equipment operation, or other safety-related issues.

Formal safety meetings may be supplemented by “toolbox talks” of 10 or 15 minutes at the start of a work shift, or at other times as designated by a supervisor.

*Safety meeting recordkeeping*

Each safety meeting will be documented with an attendee sign-in sheet and a meeting agenda that includes the supervisor’s name, date of meeting, and subject(s) covered. This documentation will be maintained for at least one year. **[*Name*]** is responsible for maintaining these records.

Hazard Assessment

A competent person will conduct hazard assessments and safety inspections for each work project and activity. Periodic inspections to identify and evaluate workplace hazards will be performed by competent person(s) in the following areas of the workplace:

|  |  |  |
| --- | --- | --- |
| **Competent Person** | **Work Area** | **Inspection Frequency** |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |

The hazard assessment and subsequent inspections will be conducted when one or more of the following conditions apply:

* When the IIPP is initially established
* When new substances, processes, procedures, or equipment which present potential new hazards are introduced into the workplace
* When new or 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
* Whenever workplace conditions warrant an inspection

See Attachment **[*number*]** *Job Hazard Analysis Worksheet (simple)* for a copy of the initial hazard assessment for a single work activity that is common to multiple work areas. For an activity with complicated tasks that require multiple steps, use Attachment **[*number*]** *Job Hazard Analysis Worksheet (detailed)*.

Management encourages employees to report hazards to their supervisor or **[*name*]**. Employees will use the *Employee Report of Hazard* form for this purpose. See Attachment **[*number*]** for a copy of the *Employee Report of Hazard*.

Activity selection

Personnel authorized by **[*name*]** to perform JHAs (i.e., JHA analysts) will select the job(s), tasks, operations, or processes to be analyzed by reviewing:

* Injury and illness data
* Near-miss reports
* New or modified work tasks, activities, or projects
* Employee safety concerns, comments, surveys, and reports
* Regulatory requirements

A JHA will be conducted for any job or task to which one or more of the following apply:

* The job or process has a history of causing injury or illness.
* There have been many near misses for the job or task.
* The job or task has a potential for catastrophe (e.g., fire, explosion, large chemical release, massive equipment failure) if something goes wrong.
* A simple human error in the task could lead to serious consequences.
* The people performing the task have changed recently.
* The job or task itself has changed recently.
* The job or task is rarely performed.
* The job is complex enough to require written instructions.
* The job is done under a safety permit, such as a confined space entry permit or a hot work permit.

Initial JHAs will be scheduled by priority, starting with tasks or operations that pose the highest risk of severe injuries. Incident history as well as the potential for future accidents will be considered in making these risk determinations. Where accident or near-miss data are lacking, a review of the nature of the job and the equipment and/or materials being used will be conducted to help determine which jobs will receive a JHA. Employee participation in the JHA selection and implementation process will be encouraged and solicited. The analysis of methods to control hazards will incorporate regulatory requirements for each type of activity.

All JHA Analysts will consider the potential for chemical, explosion, electrical, ergonomic, fall, fire, heat and cold, machinery, noise, radiation, struck by/struck against, weather, and other relevant hazards and the likelihood of accidents in their operations when determining the priorities.

Management encourages employees to report hazards to their supervisor or **[*name*]**. Employees will use the *Employee Report of Hazard* form for this purpose.

See Attachment **[*number*]** for a copy of the *Employee Report of Hazard*.

Inspection procedures

Following are the specific JHA procedures, listed in the order in which they will be performed.

1. **List specific activities.** Make a list of specific activities that will be performed by employees at a particular location (work area or jobsite), for the use of machines and equipment, or for a specific process or project. Where projects are very broad and involve diverse activities, conduct a JHA for each activity.
   1. When a project or activity involves the same tasks and the same conditions over a wide range of work areas, a single JHA will suffice. For a simple activity, use Attachment **[*number*]** *Job Hazard Analysis Worksheet (simple)*.
   2. For an activity with complicated tasks that require multiple steps, use Attachment **[*number*]** *Job Hazard Analysis Worksheet (detailed)*.
   3. For activities that may require other PPE, use Attachment **[*number*]** *Personal Protective Equipment Hazard Assessment Certificate.*
2. **List each potential hazard.** Inspect and examine the hazards or potential hazards associated with each task or activity. Continue to use the worksheet or certificate used to list the specific tasks.
   1. Inspect the location where the activities are or will be performed to determine if there are any apparent hazards, such as poor lighting, live electrical contacts, improperly stored materials or waste, adjacent operations that may affect the safe operation of the job under review.
   2. Interview appropriate personnel who are familiar with the job and/or equipment. The intent of the interviews is to determine the orderly sequence of job tasks and any perceived hazards.
   3. Observe, where possible, employees performing the actual job tasks. Thoroughly document the findings on the JHA worksheet.
   4. Review available literature associated with the particular activity for additional hazards, including safety data sheets (SDSs), equipment manuals, safety checklists, and existing health and safety plans and manuals.
3. **List corrective controls.** Once the hazards are identified, select the corrective controls that will be implemented to ensure employee safety and health, and list them on the appropriate worksheet or certificate. Corrective controls will be considered in the following order of precedence:
   1. Elimination—Removing the hazard or hazardous work practice from the workplace. This is the most effective control measure.
   2. Substitution—Substituting or replacing a hazard or hazardous work practice with a less hazardous one. For example, substitute a less hazardous or toxic solvent for a highly flammable or carcinogenic solvent.
   3. Engineering control—If the hazard cannot be eliminated or substituted, an engineering control is the next preferred measure. This may include modifications to tools or equipment such as providing guards to machinery or equipment, or providing local exhaust or general ventilation to control emissions of toxic or hazardous gases, vapors, or particulates.
   4. Administrative control—Introducing work practices that reduce the exposure to workers. Some examples include limiting the amount of time a person is exposed   
      to a particular hazard, demarcating exclusion areas and establishing physical access controls to prevent workers from entering hazardous areas, and ensuring proper training of employees.
   5. Personal protective equipment—Use PPE when other control measures are not feasible or as an interim control until one of the other described controls can be implemented. If PPE is required, complete Attachment **[number]**, *Personal Protective Equipment Hazard Assessment Certificate.*
4. **Certify and document the JHA.** Ensure that the JHA is reviewed and signed by an authorized Job Hazard Analyst, and shared with and signed by all of the employees who will be doing the work.
5. **Write safe job procedures.** Write a procedure for safely performing a job in a step-by-step format. Use clear, simple language. Make sure to specify safe work practices and any required PPE in your written procedures. Review the completed safe job procedures with workers who perform the task, and keep a written copy of the safe job procedures in a location that is easily accessible to workers.
6. **Review and modify the JHA, as necessary.** Repeat the JHA process, as necessary, by evaluating new equipment or work processes, reviewing accident records, and periodically reevaluating the suitability of previously selected PPE and/or engineering controls.

Accident/Exposure Investigations

If an employee sustains a work-related injury, the employee or a co-worker will immediately notify the supervisor of the work-related injury or illness, and the supervisor will ensure the injured or ill employee receives prompt medical treatment. The employee will complete the employee part of the **[*name of the accident report form*]**. If the date and time of the injury or illness cannot be determined, such as an injury caused by cumulative or repeated stress, the date of the last time the employee worked is entered on the form.

See Attachment **[*number*]** for a copy of the *Accident Investigation Report*.

Any person who observes or causes damage to property or equipment will immediately report such damage to a supervisor.

Injury to Visitors

Injuries sustained by visitors at this facility must be reported to **[*name, job title, or department*]**. Injured visitors will be immediately provided medical treatment, if necessary. The causes of injuries to visitors will be investigated through the same processes as for an employee accident investigation.

Near-Miss Incident

The investigation procedures for near-miss incidents will follow an abbreviated outline derived from the *Accident Investigation Report* procedures.

See Attachment **[*number*]** for a copy of the *Near-Miss Investigation Report* form.

**[*Modify the following subsection to describe the procedures in place at your facility.*]**

Accident Investigation Procedures

The Principal Accident Investigator and/or other Accident Investigator(s) will follow the procedures outlined below to conduct accident investigations:

1. Launch an accident investigation after a work-related injury or illness that requires medical treatment or if property damage occurs at any **[*organization name*]** worksite.  
   **[*Add one or both of the following sentence(s) if repetitive stress or near-miss accidents are investigated at your worksite:*** *Repetitive stress injuries (not the result of a single accident) will be investigated.  
   Near-miss incidents will also be investigated.***]**
2. Assign investigators to carry out specific tasks. Such tasks include:
   * Inspect the accident site.
   * Interview witnesses and injured person(s).
   * Compile and review data.
   * Develop recommendations for corrective action(s).
   * Compile the written investigation report.
3. Present a preliminary briefing to the investigating team, including:
   * A description of the accident, with damage estimates
   * Normal operating procedures
   * Maps (local and general)
   * The location of the accident site
   * List of witnesses
   * Events that preceded the accident
4. Visit the accident site to:
   * Secure the site to protect evidence and prevent further injuries.
   * Inspect the area, including walking and working surfaces, equipment, entrances and exits, air quality systems, and all other conditions, processes, or items that could possibly have contributed to the accident or injury.
   * Record electronically and in writing the details of the accident site, including lighting conditions, other environmental factors, and any unsafe conditions, tools, equipment, or operations.
   * Document the location of victims, witnesses, machinery, energy sources, and hazardous materials.
   * Prepare the necessary sketches and photographs, label each item carefully, and keep accurate records.
5. Interview each injured person and witness. Also, interview those who were present before the accident and those who arrived at the site shortly after the accident. Keep accurate records of each interview. Record the interviews if desired and if approved.
6. **[*Choose the******best option for determining the cause of an accident or insert your own process;******delete the option(s) not chosen:***
   * ***Option 1: Abnormality determination***
   * ***Option 2: Change analysis*]**

**[*Option 1*]**

After all information from the accident site and interviews has been collected, determine and record in writing:

* + What was unusual before the accident
  + Where the abnormality occurred
  + When the abnormality was first noted
  + How it occurred

**[*Option 2*]**

Conduct a change analysis of all the information from the accident site and interviews.

* + Define the problem (what happened?).
  + Establish the norm (what should have happened?).
  + Identify, locate, and describe the change (what, where, when, to what extent?).
  + Specify what was and what was not affected.
  + Identify the distinctive features of the change.
  + List the possible causes.
  + Select the most likely causes.

1. Analyze the data collected from the determination/analysis of accident causes. Repeat any of the prior steps, if necessary. Determine:
   * Why the accident occurred
   * A likely sequence of events and probable causes (direct, indirect, and basic)
   * Alternative sequences
2. Check each sequence against the data from the determination/analysis of accident causes.
3. Determine the most likely sequence of events and the most probable causes.
4. Develop recommendations for corrective action, if needed.
5. Conduct a postinvestigation briefing.
6. Prepare a summary report that includes recommended actions to prevent a recurrence, and distribute the report according to applicable instructions. See Attachment **[*number*]** for a copy of the *Accident Investigation Report* form and instructions.

Hazard Correction

Corrective actions recommended in the hazard assessment and inspection report(s) and approved by management will be implemented. Supervisors will inform employees of the hazards and corrective actions, and conduct employee training before the commencement of related tasks.

Management will implement the following protective measures when hazardous conditions are present:

1. Correct the hazard when observed or discovered with administrative controls, engineering controls, training, and/or PPE.
2. Remove workers from an area where an imminent hazard is present that cannot be corrected without endangering employees or property.
3. Provide workers who will correct the hazard with appropriate hazard controls and PPE.

Management ensures that the worksite and all machinery will be maintained properly so that the workplace remains safe and healthy. If maintenance needs exceed the capability of worksite employees, contract employees will be hired to do the work, and they will be screened and supervised to ensure they work according to the site’s safety and health procedures.

Corrective Actions

**[*Insert here any corrective actions identified in your inspection reports for primary or common hazards that do not require a separate safety and health program. Otherwise, delete this subsection.*]**

Personal Protective Equipment

**[*Name*]** will provide the necessary PPE to ensure the well-being of the employee. These items include:

**[*Modify the list as appropriate.*]**

* Safety glasses
* Gloves
* Hard hats
* Hearing protection
* Safety shoes
* Respiratory equipment

Supervisors will review work areas and operations and provide the necessary protection. Employees are expected to wear such PPE.  Failure to do so may lead to discipline up to and including termination.

Training and Instruction

**[*Compile the training materials you will need (e.g., slide presentations, lesson plans, handouts) from your own sources or from the many training resources available online*.]**

All workers, managers, and supervisors will receive training and instruction on general and job-specific safety and health practices. Training and instruction will be provided:

* When the training program is initiated
* When new employees are hired
* When existing employees are reassigned to jobs for which they have not received prior safety training
* Whenever new substances, procedures, processes, equipment, or facilities are introduced and represent a new hazard
* On a regular basis to reinforce existing safety and health procedures

General job safety and health training will include:

* An explanation of the organization’s safety program and general safety rules
* Instructions to report unsafe conditions, work practices, and injuries
* Information about medical services and first-aid assistance and location of assistance and materials
* The use of PPE on designated jobs
* Information about chemical hazards to which employees could be exposed and other worker right-to-know information
* Procedures for responding to emergencies and fire prevention

In addition, we will provide specific instructions and training to all workers regarding the hazards that are unique to their job assignments, including wearing and caring for PPE, if required for the job.

List of training subjects

Following is a list of safety topics that will be covered, depending on each employee’s work assignments:

**[*Modify this list as applicable to your work operations*.]**

* The employer’s Code of Safe Practices
* Confined spaces
* Safe practices for operating machinery and equipment
* Good housekeeping
* Safe procedures for cleaning, repairing, servicing, and adjusting equipment and machinery
* Safe access to working areas
* Protection from falls
* Electrical hazards
* Crane operations
* Trenching and excavation work
* Proper use of powered tools
* Machine guarding and safe practices for working around machinery
* Lockout/tagout procedures
* Material handling, including forklifts
* Power tool operation
* Loading dock safety
* Fall protection from elevated locations
* Driver safety
* Slips, falls, and back injuries
* Proper use, storage, and maintenance of ladders
* Ergonomic hazards, including proper lifting techniques
* PPE
* Respiratory equipment
* Hazardous chemical exposures
* Hazard communication, including SDSs and container chemical labels
* Physical hazards, such as heat/cold stress, noise, and ionizing and nonionizing radiation
* Laboratory safety
* Bloodborne pathogens and other biological hazards
* Emergency response, evacuation, and alarms
* Fire prevention

**[*Name*]** maintains copies of safe work practices and training documents for each safety topic.

Recordkeeping

**[*Name*]** will maintain all records related to this Plan. Unless otherwise noted, the records will be kept **[*location*]**. All records are available for employee and regulatory agency review on request.

**JHA Records.** All JHA records and forms will be kept by **[*name*]** for **[*duration*]**.

Injury and illness records

Our organization must record all employee injuries and illnesses on the following three forms:

* OSHA Form 301
* OSHA Form 300
* OSHA Form 300A

1. All supervisors are required to fill out the OSHA Form 301—Injury and Illness Incident Report for each injury or illness that is considered recordable under OSHA regulations. The supervisor must fill out the form within 7 calendar days after finding out about the injury or illness. A copy of this record will be sent to **[*name*]**. These records will be kept for 5 years.
2. **[*Name*]** is responsible for entering the information on the OSHA Form 300—Log of Work-Related Injuries and Illnesses within 7 calendar days of receiving notice of a recordable illness or injury. This form will be retained for 5 years even if there are no recordable injuries or illnesses.
3. At the end of each calendar year, **[*name*]** will review the OSHA 300 Log to verify that the entries are complete and accurate. This information will be summarized and entered on OSHA Form 300A—Summary of Work-Related Injuries and Illnesses. The Summary will be signed and dated by a company executive and will be posted in a conspicuous place available to all employees from February 1 to April 30.

**Accident investigation records.** **[*Name*]** will maintain comprehensive accident/injury records and will maintain records of all accident investigation reports and data for **[*duration*]**.

Training recordkeeping

Records of health and safety training for each employee will include:

* Employee name or other identifier
* Training dates
* Type(s) of training
* Information about the training providers

This documentation will be maintained for at least 1 year. **[*Name*]** is responsible for maintaining these records. See Attachment **[*number*]** for a copy of the *Employee Training Record* form.

**[*Name*]** will keep employee training records (e.g., curriculums, written or electronic materials, sign-in sheets, individual employee records) for **[*duration*]**.

Supporting materials

**[*This product includes supporting materials, such as forms or attachments, which you may need to supplement your EHS plan.*]**

Attachment **[*number*]**—Code of Safe Practices

Attachment **[*number*]**—Safety Committee

Attachment **[*number*]**—Job Hazard Analysis Worksheet (simple)

Attachment **[*number*]**—Job Hazard Analysis Worksheet (detailed)

Attachment **[*number*]**—Employee Report of Hazard

Attachment **[*number*]**—Personal Protective Equipment Hazard Assessment Certificate

Attachment **[*number*]**—Accident Investigation Report

Attachment **[*number*]**—Near-Miss Investigation Report

Attachment **[*number*]**—OSHA Form 300

Attachment **[*number*]**—OSHA Form 300A

Attachment **[*number*]**—OSHA Form 301

Attachment **[*number*]**—Employee Training Record