

INJURY AND ILLNESS PREVENTION PROGRAM FOR

Hanna Interpreting Services LLC

RESPONSIBILITY

The Injury and Illness Prevention Program (IIPP) administrator, Sarah Scott; Human Resources Director has the authority and responsibility for implementing the provisions of this program for Hanna Interpreting Services LLC.

All managers and supervisors are responsible for implementing and maintaining the IIPP in their work areas and for answering worker questions about the Program. A copy of this IIPP is available in the Human Resources Office.

COMPLIANCE

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

All employees are responsible for using safe work practices, for following all directives, policies and procedures, and for assisting in maintaining a safe work environment. The following is our system of ensuring that all workers comply with the rules and maintain a safe work environment:

- Informing workers of the provisions of our IIPP;
- Evaluating the safety performance of all workers;
- Recognizing employees who perform safe and healthful work practices. This recognition is accomplished by: recognizing them in our bi-weekly meetings.
- Providing training to workers whose safety performance is deficient;
- Disciplining workers for failure to comply with safe and healthful work practices. The following outlines our disciplinary process: When it becomes necessary, our company reserves the right to discipline employees who knowingly violate company safety rules or policies. Disciplinary measures will include, but are not limited to:
 1. Verbal warning (documented) for minor offenses.
 2. A Written warning for more severe or repeated violations.
 3. Final Warning if continued violations. (Should an employee's action result in a serious enough infraction, prior verbal or written warnings may be skipped and a final warning may be the only warning)
 4. If none of the above measures achieve satisfactory corrective results, and no other acceptable solution can be found, the company will have no choice but to

TERMINATE employment for those who continue to jeopardize their own safety and the safety of others.

- Other means that we use to ensure employee compliance with safe and healthful work practices include: We encourage employees to remind others to work safely and report any unsafe hazards they may find and we conduct regular Monthly training using <https://www.dir.ca.gov/dosh/etools/09-002/index.htm> to assist in our training.

COMMUNICATION

The following is our system of communication, designed to facilitate a continuous flow of two-way (management, supervision and employees) safety and health information in a form that is readily understandable to and between all affected site personnel:

- New hire orientation, including a discussion of site-specific safety and health policies and procedures.
- Follow-through by supervision to ensure effectiveness.
- Workplace-specific safety and health training conducted by Supervisor with New Team member..
- Safety Issues are on our Bi-weekly Meeting Agenda so as to share important information to employees, as well as promote safety awareness. Additional meetings may be held as tailgate meetings as deemed necessary by the creation of hazards or occurrence of injuries and illnesses.
- Effective communication of safety and health concerns between workers and supervisors, including language translation where appropriate.
- Safety Flyers are posted and distributed.
- A system for workers to anonymously inform management about workplace hazards. This is accommodated by using our Suggestion Box located in the Breakroom.
- Vehicle and site-specific codes of safe work practices.
- Other means we use to ensure communication with employees include:
 1. Creating and maintaining an Open Door policy between management and staff on matters pertaining to safety to share safety concerns and voice personal opinions regarding safety and health matters.
 2. All input regarding safety is considered important, and employees are encouraged to actively participate in the company safety program.

3. Employees should feel free to express any safety concerns during meetings, individually to supervisors, or in writing on the Safety Hazard Notice Form.
4. All safety suggestions will be given serious consideration and each will receive a response.
5. The company will provide current safety news and activities, safety reading materials, signs, posters and a bulletin board for easy access to information.

Our organization Management Team will be responsible for carrying out Inspections and Training of staff.

HAZARD ASSESSMENT

Periodic inspections to identify and evaluate workplace hazards shall be performed by the Management Team according to the following schedule:

- When our Injury and Illness Prevention Program was first established;
- At least Monthly prior to beginning of the shifts;
- When new substances, processes, procedures or equipment that present potential new hazards are introduced into our 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 inspection.

Periodic inspections consist of identification and evaluation of workplace hazards utilizing applicable sections of the attached Hazard Assessment Checklist*, and any other effective methods to identify and evaluate workplace hazards.

ACCIDENT/EXPOSURE INVESTIGATIONS

Investigation of workplace accidents, hazardous substance exposures and near-accidents will be done by Human Resources Director, and will include:

- Visiting the scene as soon as possible;
- Interviewing affected workers and witnesses;
- Examining the workplace for factors associated with the accident/exposure/near-accident;

- Determining the causes of the accident/exposure/near-accident;
- Taking corrective action to prevent the accident/exposure/near-accident from reoccurring; and
- Recording the findings and corrective actions taken on the attached OSHA Form 301.

HAZARD CORRECTION

Unsafe or unhealthy work conditions, practices or procedures at our work facilities shall be corrected **in a timely manner** based on the severity of the hazards, and according to the following procedures:

- When observed or discovered;
- When an imminent hazard exists which cannot be immediately abated without endangering employee(s) and/or property, we will remove all exposed workers from the area except those necessary to correct the existing condition. Workers necessary to correct the hazardous condition shall be provided with the necessary protection; and
- All such actions taken and dates they are completed shall be documented on the attached Identified Hazards and Correction Record*.

TRAINING AND INSTRUCTION

All workers, including management and supervisors shall have training and instruction on general and job-specific safety and health practices. Training and instruction shall be provided as follows:

- When the IIPP is first established;
- To all new workers;
- To all workers given new job assignments for which training has not previously provided;
- Whenever new substances, processes, procedures or equipment are introduced to the workplace and represent a new hazard;
- Whenever we become aware of a new or previously unrecognized hazard;
- To supervisors to familiarize them with the safety and health hazards to which workers under their immediate direction and control may be exposed; and
- To all workers with respect to hazards specific to each employee's job assignment.

This training will include (but is not limited to):

- Explanation of our IIPP, emergency action plan and fire prevention plan, and measures for reporting any unsafe conditions, work practices, injuries and when additional instruction is needed.
- Availability of toilet, hand-washing, and drinking water facilities.
- Provisions for medical services and first aid, including emergency procedures.
- Proper housekeeping, such as keeping stairways and isles clear, work areas neat and orderly, and promptly cleaning up spills.
- Prohibiting horseplay, scuffling, or other acts that adversely influence safety.
- Proper storage to prevent:
 - stacking goods in an unstable manner
 - storing materials and good against doors, exits, for extinguishing equipment and electrical panels.
- Prevention of musculoskeletal disorders, including proper lifting techniques.
- Use of appropriate clothing, including gloves, footwear, and personal protective equipment.
- Information about chemical hazards to which employees could be exposed and other hazard communication program information.
- Proper food and beverage storage to prevent them from becoming contaminated.

In addition, we provide specific instructions to all workers regarding hazards unique to their job assignment, to the extent that such information was not already covered in other training.

RECORDKEEPING

Our organization has taken the following steps to implement a written IIPP and maintain documentation requirements:

Our organization has ten or more employees and keeps records as follows:

1. Records of scheduled and periodic inspections including the person(s) conducting the inspection, the workplace hazards (i.e., unsafe conditions and work practices that have been identified) and the action(s) taken to correct the identified unsafe conditions and work practices, are recorded on the Hazard Assessment Checklist* and the Identified Hazards and Correction Record* and the Investigation/Corrective Action Report*. These records are maintained for at least one (1) year.

2. Documentation of safety and health training for each worker, including the worker's name or other identifier, training dates, type(s) of training, and training providers are recorded on the Worker Training and Instruction Record*. This documentation is maintained for at least one (1) year. Upon termination employees may request copies of signed safety records.

*** Sample forms and checklists are attached which are used for documentation the various elements of our IIPP Manual.**

References

Universal Precautions

<https://drive.google.com/file/d/1fI6qmlvPfrFrUZQ1RZugTpUVThBMciIZ/view?usp=sharing>