

INJURY AND ILLNESS PREVENTION PROGRAM

RESPONSIBILITY

The Injury and Illness Prevention Program (IIPP) administrator, Chief Financial Officer or designee, has the authority and responsibility for implementing the provisions of this program for Excelsior Charter Group.

All managers, supervisors and lead personnel 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 Business Office and on the website.

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: Informal recognition of safety practices;
- Providing training to workers whose safety performance is deficient;
- Disciplining workers for failure to comply with safe and healthful work practices. The following outline(s) our disciplinary process: Verbal warning (documented) for minor offenses;
- Other means that we use to ensure employee compliance with safe and healthful work practices include: Informing workers of the provisions of our IIP Program.

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 worker 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.
- Safety meetings will be conducted at the beginning of every fiscal year. These meetings will be brief and will cover 1-2 specific subjects. Safety meetings are required by CAL/OSHA in order to successfully communicate important information to employees, as well as promote safety awareness. These meetings will be

documented, and held more frequently 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.
- Posted and distributed safety information.
- A system for workers to anonymously inform management about workplace hazards. This is accommodated by Employee Hazard Reporting Program. Employees will also be responsible for reporting any unsafe act or unsafe condition to their supervisor in writing. The supervisor will then take appropriate action.
- Vehicle and site-specific codes of safe work practices.
- We recognize that open, two-way communication between management and employee 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 employee in a form that is readily understandable and consists of the following items:
 - We will conduct new worker orientation including a discussion of safety and health policies and procedures, as well as our IIP Program.
 - An authorized instructor will conduct workplace safety and health training.
 - Posting and / or distributing safety information.

ECG elects to use an operational planning team, meeting all the requirements of T8CCR 3203 (7)(c)(1) – (7) to comply with the communication requirements of subsection (a)(3) of T8CCR 3203.

HAZARD ASSESSMENT

Periodic inspections to identify and evaluate workplace hazards shall be performed by the CFO or designee according to the following schedule:

- When ECG's Injury and Illness Prevention Program was first established;
- At least quarterly prior to beginning of the shifts;
- When new substances, processes, procedures or equipment that present potential new hazards are introduced into the workplace;
- When new, previously unidentified hazards are recognized;
- When occupational injuries and illnesses occur;
- When hiring and/or reassigning 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 the CFO or designee, 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, all exposed workers will be removed 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, supervisors, and lead personnel 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 been previously provided;
- Whenever new substances, processes, procedures or equipment are introduced to the workplace and represent a new hazard;
- Whenever ECG personnel 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 goods against doors, exits, for extinguishing equipment and electrical panels.

Where applicable the training may also include:

- 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

Written IIPP and Documentation Requirements

ECG has taken the following steps to implement and maintain its IIPP:

ECG 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.

Adopted: 04/17/2018

Amended: