

Injury and Illness Prevention Program

for

Zempleo, Inc.

Company Name

5976 W Las Positas Blvd

Address

Suite 206

Address

Pleasanton

City

CA

State

94588

Zip Code

Adopted:

1/1/2003

Date

Injury and Illness Prevention Program for Non-High Hazard Employers

This document constitutes the Zempleo, Inc. (Company name) Injury and Illness Prevention Program (IIPP), which meets the written program requirements of Cal/OSHA standard (8 CCR§3203). Title 8 of the California Code of Regulations §3203 requires all California employers to develop, enforce and maintain a written IIPP*. Employees should be aware of their company's IIPP and have access to a written copy of the plan at each worksite, or at least at a central workplace if job sites change frequently. This plan meets all required IIPP elements.

Zempleo, Inc.
Company Name

(888) 223-4788
Phone Number

5976 W Las Positas Blvd, Suite 206
Address

Pleasanton CA 94588
City State Zip Code

1. Management Approval and Persons Responsible

Adoption: This IIPP is hereby approved and supersedes any previous program that has been in effect since July 1, 1991.



Signature of Management Official

1/1/2016
Date

Sabrina Chisholm
Printed Name

Principal - HR/Legal
Title

The person listed below is the IIPP administrator and is responsible for implementing this IIPP:

Sabrina Chisholm
Name

Principal - HR/Legal
Title

2. Safety Policy Statement

It is our Company policy to provide a safe and healthful workplace. Every employee is responsible for his/her safety, as well as the safety of others in the workplace. To achieve our goal of maintaining a safe workplace, everyone must be safety conscious at all times. To comply with California law, and to promote the concept of a safe workplace, this Company maintains an IIPP. The IIPP is available for employee and/or employee representative review at (check one):

- ☐ Work Locations
- ☐ Central Workplace
- ☒ Other: Included in New Hire Onboarding Documents; available in WebCenter employee documents.

*There are exemptions to specific sections of §3203 for employers with fewer than 20 employees. Please review Cal/OSHA's information for employers not on a designated list of high-hazard industries or on the designated list of low-hazard industries. This information may be found on the Cal/OSHA website at www.dir.ca.gov.

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3. Elements Included in this IIPP

Injury and Illness Prevention Program Requirements: This IIPP includes all of the following minimum elements consistent with the IIPP standard as contained in 8 CCR §3203 and other applicable Cal/OSHA standards:

- A system to identify, correct and prevent safety and health hazards
- Periodic scheduled inspections
- Investigation of injuries, illnesses and accidents
- Employee safety training
- Communication with employees regarding safety and enforcement of safety rules
- Recordkeeping consistent with applicable requirements

Other Mandatory Cal/OSHA Standards: This IIPP includes information that addresses certain standards that apply to all employees:

- *Emergency Action Plan*, including medical emergencies
- *Fire Prevention Plan*, including fire emergency planning
- *Hazard Communication Program*

4. Communication of and Compliance with Safe Work Practices

Employees at all levels of employment must comply with safe work practices. Our Company has a system in effect to communicate with employees about health and safety and to assure compliance with safe work practices. The IIPP administrator will make certain that effective employee communication is maintained through the following methods:

- Periodic safety meetings
- Explanation of the IIPP and its procedures to new employees through a new employee orientation program
- Employee safety suggestions and questions (including anonymous ones) are provided with responses and considered by management
- Safety information is posted regularly in an obvious place
- One-on-one counseling
- *Hazard Communication Information Summary* is made available to all affected employees

Employee Communication: Our Company uses communication methods that are readily understandable by all workers, and we encourage employees to report workplace hazards without fear of reprisal.

Upon hiring, we identify employees with special communication needs and address those needs so that every employee understands the company safety policy, compliance methods and failure-to-comply disciplinary actions.

Employee Compliance: Our Company requires employees to comply with safe work practices and we recognize individuals who adhere to the safety policies. If we observe noncompliance, we will use the following disciplinary measures, as appropriate, to assure future compliance. The disciplinary method used shall match the severity and frequency of the safety policy violation.

- Private counseling by the IIPP administrator or the violating employee's supervisor
- Loss of incentives, negative effect on performance evaluation and similar personnel actions
- A written warning or warnings
- Suspension or termination

Documentation of Safety Communications and Enforcement: Our Company documents each instance of employee communication regarding the safety policy, using one of the following techniques:

- Recording Safety meeting attendees on a *Training Sign-in Sheet*, which is saved and filed
- Maintaining written employee safety suggestions or questions on file, along with our response including information on how we provided the response to employees
- Documenting actions taken to enforce compliance with safe work practices that exceed verbal counseling in the employee's personnel record by the IIPP administrator

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5. System to Identify, Correct and Prevent Safety and Health Hazards

Hazard Identification: This IIPP's system to identify safety and health hazards includes:

- Using information from Cal/OSHA standards and other relevant material in this program to discover any potential hazards in the workplace.
- Identifying potential hazards by investigating injuries, illnesses and accidents using the *Accident Injury and Illness Investigation Form*.
- Identifying and preventing repetitive motion injuries using the *Hazard Prevention Data Sheet: Ergonomics Safety*
- Considering information provided by employees.
- Conducting periodically scheduled inspections using the following checklists, as applicable:
 - o *Inspection Checklist for General Work Areas and Offices*
 - o *Inspection Checklist for Work Spaces and Surfaces*
 - o *Fire Prevention Checklist*
 - o *Ergonomics Checklist: Computer and Keyboard Issues*
 - o *Ergonomics Checklist: Hand Tool Use*
 - o *Ergonomics Checklist: Manual Handling*
 - o *Ergonomics Checklist: Task/Work Methods*
 - o *Ergonomics Checklist: Workstation Layout*

Prevention of Hazards: Hazard inspections shall be performed:

- At the time this IIPP was established.
- Whenever new potential hazards are introduced to the workplace.
- Whenever previously unrecognized hazards are identified.
- Whenever injuries or illnesses occur.
- Whenever new permanent or seasonal employees are hired or reassigned to areas where potential hazards exist.
- Whenever warranted.

Documentation of Inspections: The person inspecting the area will complete a *Hazard Assessment and Correction Record*, recording the inspection date, the area inspected, any observed hazards or deficiencies and corrective action taken. If no deficiencies are noted, the inspector shall so indicate.

Hazard Correction: Our Company assures compliance with any applicable Cal/OSHA standard to address hazards covered by such standards. In addition, any unsafe or unhealthy condition or work practice we discover will be corrected in a timely manner, based on the following:

- If the discovered hazard may cause impending injury or illness, employees shall be removed from the area, source of exposure or unsafe equipment until the hazard is corrected. Only those employees wearing protective equipment and trained to correct the hazard will be admitted to the affected area or participate in the correction.
- If the hazard is one that is easily abated, it shall be corrected immediately.
- Other hazards shall be corrected in a timely manner.

Hazard abatement will be documented on the related *Hazard Assessment and Correction Record*.

6. Investigating Injuries, Illnesses and Accidents

Policy and Responsibility: Our Company will investigate injuries, illnesses or accidents to determine if any preventable safety or health hazard contributed to the incident. The IIPP administrator will conduct, or appoint a responsible person to conduct, the investigation within a timely manner. The investigation will include:

- Interviewing injured workers and witnesses.
- Examining the workplace for factors associated with the accident/exposure.
- Determining the cause of the accident/exposure.
- Taking corrective action to prevent the accident/exposure from recurring.
- Recording the findings and corrective actions taken.

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Serious Injury or Death: If a reportable serious injury or death results, the IIPP administrator will assure that a report is made to Cal/OSHA within eight hours using the *Serious Incident Report Fax*.

Documentation of Investigation: Our Company will document each investigation of an injury, illness or accident to indicate information about the incident, the investigation's finding, whether a workplace hazard contributed to the incident, how the hazard will be abated and who the investigator was.

We document investigations using the *Accident, Injury and Illness Investigation Form*. If a recordable injury occurs, we document with the *Injury and Illness Incident Report* (Cal/OSHA Form 301).

7. Safety Training for Employees

Policy and Responsibility: Our Company provides employees training in safe work practices and prevention of injuries and illnesses:

- When the IIPP was first established
- When an employee is hired or reassigned, prior to exposure to any potential hazards
- Whenever new substances, processes, procedures or equipment are introduced to the workplace that represent a new hazard
- Whenever we are made aware of a new or previously unrecognized hazard

We also provide training to supervisors to familiarize them with the safety and health hazards to which workers under their direction may be exposed. We track all individual training activity with the *Worker Training and Instruction Record*.

Training includes, but is not limited to:

- Implementation and maintenance of the IIPP Program.
- Emergency Action and Fire Prevention Plans.
- Provisions for medical services and first aid, including emergency procedures.
- Prevention of musculoskeletal disorders, including proper lifting techniques.
- Proper housekeeping, such as keeping stairways and aisles clear, work areas neat and orderly and promptly cleaning up spills.
- Prohibiting horseplay, scuffling or other acts that tend to adversely influence safety.
- Proper storage to prevent stacking goods in an unstable manner and storing goods against doors, exits, fire extinguishing equipment and electrical panels.
- Proper reporting of hazards and accidents to supervisors.
- Hazard communication, including worker awareness of potential chemical hazards and proper labeling of containers.
- Proper storage and handling of toxic and hazardous substances, including prohibiting eating or storing food and beverages in areas where they can become contaminated.
- Heat illness prevention as required by Cal/OSHA standards.

The IIPP administrator is responsible for assuring employee training is provided and documented. Supervisors and other chosen employees may be designated to assist with training.

Documentation of Training: Our Company documents training as follows:

- The *Worker Training and Instruction Record* documents the employee's training status, including that IIPP training was provided and when additional training was received for new hazards, new assignments or to meet refresher training requirements. This form is kept in each employee's personnel record.
- The *Training Sign-up Sheet* documents group training sessions by indicating the date, subject of the training, the name of the trainer and attendees. This form is used to update individual *Worker Training and Instruction Record* forms.
- The *Individual Training Certificate* documents individual training and is kept in the employee's personnel file. This form is used to update individual *Worker Training and Instruction Record* forms.

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8. Recordkeeping and Posting Requirement

Policy and Responsibility for IIPP Recordkeeping: The IIPP administrator maintains records that document IIPP implementation. The following records will be maintained for the period indicated, at a minimum:

IIPP Records	Time Period Maintained
The Written IIPP	Indefinitely
OSHA Log 300 Forms	5 years
Inspection Forms	1 year
Investigation Forms	1 year (if a Log 300 injury, 5 years)
Employee Training Forms: • Personnel Records • Training Sign-up Sheets	Duration of employment 1 year
Records Relating to Employee Communication and Enforcement • Safety Meeting Sign-up Sheets • Employee Suggestion/Question & Responses • Disciplinary Actions	3 years 3 years 3 years
All Other Safety Records other than those Subject to the Access Standard	3 years
Employee Exposure Records (Subject to §3204)	30 years
Medical Records (Subject to §3204)	Duration of employment plus 30 years

Poster Policy: Our Company posts all posters required by federal and state occupational safety and health and labor laws and regulations in the workplace.

9. Maintaining the Injury and Illness Prevention Program

Reviewing and Updating the IIPP: The IIPP administrator will periodically review this IIPP, verify effective implementation of each program element and make any necessary changes. He or she will communicate program status and revisions to management and employees.

New Employees: Each new hire will be subject to the IIPP. All employees transferred to a new job will be trained in the safety aspects of the new assignment. The IIPP administrator will assure that each new employee is included in the IIPP and will provide training on any provisions applicable to the new, or transferring, employee's position.

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10. Forms

Our Company uses the forms listed below to document activities connected with IIPP maintenance. Completed forms are to be filed in the location noted below.

Form	File Location
<i>Emergency Action Plan</i>	With IIPP
<i>Fire Prevention Plan</i>	With IIPP
<i>Hazard Communication Program</i>	With IIPP
<i>Hazard Communication Information Summary</i>	With IIPP
<i>Training Sign-in Sheet</i>	With IIPP
<i>Hazard Prevention Data Sheet: Ergonomics Safety</i>	With IIPP
<i>Accident, Injury and Illness Investigation Form</i>	With IIPP
<i>Inspection Checklist for General Work Areas and Offices</i>	With IIPP
<i>Inspection Checklist for Work Spaces and Surfaces</i>	With IIPP
<i>Fire Prevention Checklist</i>	With IIPP
<i>Ergonomics Checklist: Computer and Keyboard Issues</i>	With IIPP
<i>Ergonomics Checklist: Hand Tool Use</i>	With IIPP
<i>Ergonomics Checklist: Manual Handling</i>	With IIPP
<i>Ergonomics Checklist: Task/Work Methods</i>	With IIPP
<i>Ergonomics Checklist: Workstation Layout</i>	With IIPP
<i>Hazard Assessment and Correction Record</i>	With IIPP
<i>Serious Incident Report Fax</i>	In employee medical files
<i>Worker Training and Instruction Record</i>	In employee files
<i>Individual Training Certificate</i>	In employee files
<i>Heat Illness Prevention Plan (Outdoor Workers)</i>	With IIPP

Note: Employers with obligations to record work place illness and injuries must use these additional Cal/OSHA forms, available online from CalChamber.com or Cal/OSHA:

Cal/OSHA Form Number	Form Name
Cal/OSHA Form 300	<i>Log of Work-Related Injuries and Illnesses</i>
Cal/OSHA Form 301	<i>Injury and Illness Incident Report</i>
Cal/OSHA Form 300A	<i>Annual Summary of Work-Related Injuries and Illnesses</i>