

CA Injury and Illness Prevention Programs

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Introduction to CA Injury and Illness Prevention Programs

OSHA and Cal/OSHA require specific written safety programs to force businesses to address certain hazards and situations with a minimum level of rigor. The requirements of these written safety programs change to match the involved hazards. Common examples are fall protection programs, hazard communication programs, and respiratory protection programs. More examples at [osha.gov](https://www.osha.gov). Injury and Illness Prevention Programs are *not* safety programs like the above. Many industrial tragedies occurred at businesses with complete safety programs. By 1991 California passed SB 198 mandating IPPs and OSHA has been publishing and updating voluntary guidelines.

Think of IPPs support safety programs as an operating system's supports apps. The safety programs will have all the details concerning staying safe around hazards, but the IIPP will have all the details concerning how the safety programs are utilized in the workplace. For example, a written respiratory protection program will include the important specifications of the respirators in use around specific hazards and how those respirators are fitted and maintained, but the IIPP will address how proper use of the respirators is constantly ensured and how management will stay committed to ordering replacement respirator filter cartridges on time. The IIPP should give a framework for dealing with unforeseen situations and hazards; it's a document detailing how the business will behave in general. There is a ton of leeway in terms of how businesses choose to behave, but detailing one thing in the IIPP and doing another in practice is grounds for a citation. Businesses that successfully utilize IPPs take the time to honestly self-reflect on their practices to produce an IIPP that is easy to stick to and thus realizes the possible benefits of a safer workplace.

Elements of an Injury and Illness Prevention Program

1. Responsibility

The IIPP should address management commitment and needs to specify, by at least title, the person with authority and responsibility for the safety and health programs of the organization.

2. Hazard Assessment

How will the organization identify hazards?

This section is arguably the most important for safety and health.

Unknown unknowns exist. Accidents happen. There is a first time for everything. A business that successfully identifies hazards will have the means to handle any situation while preventing exposure to hazards, and thus liability. It is common for industrial accidents to occur/get worse as a result of workers ignoring obvious signs of impending equipment failures/danger in order to ‘get the job done’. These workers generally feel forced to work fast and do not have the resources and support from management to properly identify hazards. Organizations need a safety culture that mandates hazard analysis as vital while streamlining the process so the people on the front lines can successfully prevent costly tragedies.

Job Site Analysis (JSA), Hazard Analysis (HA), Functional Hazard Analysis (FHA), and Activity Hazard Analysis (AHA) - are all common examples of the practice’s businesses use. While all functionally similar, these practices can be employed with different strategies. Some of these focus on locations and hazards defined by position, such as impact zones around moving parts of stationary equipment. Other strategies focus on the employee’s task and identifying probable accidents. Whatever strategy works best will depend on the business, its processes, associated hazards, and employees. The most important aspect of Hazard Analysis is that it works when it needs to, especially under unforeseen circumstances; the people on the front lines need the means and authority to prevent accidents before they happen, whatever that means for the business. In general; in a manufacturing setting, hazard analysis should be done before the first time any process is performed and after any process is changed in anyway.

All hazards that are recognized should be quantified whenever possible. If you have documented the process of quantifying a hazard and have the quantified result (a number), then you have assessed the hazard. Every hazard can be measured with a number. There are numerical limits and sampling guides on most every known hazard made public by OSHA in the [OSHA Technical Manual](#) (OTM). It is common to outsource such technical hazard sampling due to the specialized nature of the required equipment and experience. While the testing equipment can be rented, if the results of any of this work were ever to come under scrutiny, then who performed the tests will be

more significant. There are certified professionals, [Certified Industrial Hygienists](#) (CIH), who can be relied upon for more legally defensible hazard assessments. Whether or not a business should bring in a CIH, consultant, or assess all hazards in-house again depends on the business and its approach to handling liability.

3. Accident/exposure investigation

How will the organization respond to injuries and illnesses?

Sending people back to work without first investigating what went wrong is how slave owners operated mines in antiquity. While it may seem over the top to have pre-planned investigation procedures, the fact is accident investigation is extremely difficult and even third parties with rigorous training and protocols often have a hard time discovering the root cause(s) of an accident. On the same level as showing management commitment, the IIPP needs to show how the business will have the resources made available to be able to perform an investigation.

4. Hazard Correction

How does the organization respond once it has identified a hazard?

All hazards should be assessed (ideally quantified) as detailed in section 2 and dealt with as detailed in this section.

Correcting hazards often times requires more authority and resources within the business than anyone dealing with the hazards has. Even if a business has a system in place for allocating resources to correct hazards, doing so needs to be prioritized so the hazard is controlled in a reasonable time from being identified. All too often hazards are known to the workers dealing with them, but not known to management or worse management knows but has de-prioritized fixing the issue.

To correct a hazard either eliminate the hazard or control the hazard. Truly eliminating hazards is often impossible due to the nature of industrialized processes, so safety professionals often focus on controls; however, elimination is the best control even if it often goes un-said. Citations require evidence of 1. Recognized hazard, 2. Zone of danger, and 3. An employee in the hazard's zone of danger; a single picture can prove all three.

The hierarchy of hazard controls: The first two as mentioned are often not practical

1. Elimination

Businesses can diversify and it is possible for an organization to stop a dangerous process and cease to profit from that process's output.

2. Substitution

- More often businesses may be able to replace one process with another safer process while still continuing to profit from the same process output. However, doing so is usually expensive.
3. Engineering
Nominally the ‘best’ hazard control. Engineering controls are physical ways of containing hazards and/or preventing employees from entering zones of danger.
 4. Administration
Depending on the situation administrative controls maybe seen as perfectly adequate or cutting corners. Admin controls are safety rules. If everyone always followed the rules no one would ever get hurt...
 5. Personal Protective Equipment
Despite being the first thing people think of when they think of hazard controls, PPE is the worst hazard control. PPE does nothing to control the hazard nor prevent the employee from entering the hazard’s zone of danger, it simply attempts to shield the employee.

5. Training

Who, when, what, how?

Most businesses fail on the when and how:

When- before the first time an employee performs the task, whenever the task changes in anyway, and when the employee demonstrates they don’t understand their prior training.

How- however, but employees need to be able to demonstrate understanding of the training. Moreover, they can demonstrate understanding in anyway; written tests, oral questions, physical demonstrations, etc.

6. Communication

How will critical safety information be communicated on an ongoing basis?

This section is not a written hazard communication program. The hazard communication program will have all the specifics of how hazards are labeled (with the GHS system) and how employees can get more information about the hazards they work with. This section of the IIPP needs to explain how communication, a two-way flow of ideas and information, will exist within the business. How will this communication be maintained? Communication top-down within businesses generally works ok, but communication bottom-up is often non-existent. True communication is a back and forth; at least two entities not only speaking and listening, but responding to what has been said. One party speaking while the other simply listens isn’t enough; information needs to not only be shared but acted on.

7. Compliance/Disciplinary

How will employees be disciplined; how will the organization enforce administrative safety controls?

Unfortunately, without consistent merciless commitment to discipline, the entire IIPP and the safety programs it supports will fail to limit liability and eventually fail to keep people safe. Without consequences all an employer's efforts to furnish a safe and healthy workplace are nothing more than nominal. However, a business chooses to enforce proper conduct, the IIPP will only hold up under appeal if the business is able to demonstrate commitment to this discipline plan; all it takes is one employee claiming after the fact that they felt the safety rules weren't enforced for the employer to be stuck with full liability. Moreover, all it takes is one employee who actually feels the safety rules are not enforced to cause a costly tragedy.

8. Recordkeeping

How will the organization keep track of everything it is supposed to?



Injury and Illness Prevention Program Template

This is a template intended as a spring board so others may create their own, unique, substantially compliant IPPs without having to start from scratch.

Many of the policies presented here are done so for your consideration only; other more traditional methods are proven to work and may very well be better suited to your business. Please see the more traditional IIPP model policy from Cal/OSHA included at the end of this document.

The following is inspired by my experience operating a solvent hash manufacturing process and is written with a small business, utilizing very little middle management between first line supervisors and senior executives, in mind. However, some references exist to larger businesses to show examples of ideas I thought useful to include.



Model Policy Statements

The Occupational Safety and Health Act of 1970 clearly states our common goal of safe and healthful working conditions being the first consideration in operating this business.

Safety and Health in our business must be part of every operation. Without questions, it is every employee's responsibility at all levels.

It is the intent of this company to comply with all laws. To do this, we must constantly be aware of conditions in all work areas that can produce injuries. No employee is required to work at a job he/she knows is not safe or healthful. Cooperation in detecting hazards and, in turn, controlling them, is a condition of employment for all employees at all levels. All employees must immediately inform their supervisor of any situation beyond their ability or authority to correct.

The personal safety and health of each employee of this company is of primary importance. Prevention of occupationally-induced injuries and illnesses is of such consequences that it will be given existential precedence over productivity as necessary. To the greatest degree possible management will provide all resources required to perform work activities safely and healthfully, in keeping with the highest standards.

We will maintain a safety and health program conforming to the best practices of our industry. To be successful, such a program must embody proper attitudes toward injury and illness prevention on the part of supervisors and employees. It also requires cooperation in all safety and health matters, not only between supervisor and employee, but also between each employee and his/her coworkers. Only through such a cooperative effort can a safety program in the best interest of all be established and preserved.

Our objective is safety and health program that will reduce the number of injuries and illnesses to an absolute minimum, not merely in keeping with but surpassing, the best experience of operations similar to ours. Our goal is zero accidents and injuries.

Our safety and health program will include:

- Providing mechanical and physical safeguards to the maximum extent possible.
- Conducting safety and health inspections to find, eliminate or control safety and health hazards as well as unsafe working conditions and practices, and to comply fully with the safety and health standards for every job.
- Training all employees in good safety and health practices.
- Providing necessary personal protective equipment, and instructions for use and care.
- Developing and enforcing safety and health rules, and requiring that employees cooperate with these rules as a condition of employment.

- Investigating, promptly and thoroughly, every accident to find out what caused it and correct the problem so it will not happen again.
- Setting up a system of recognition and awards for outstanding safety service or performance.

We recognize that the responsibilities for safety and health are shared:

- The employer accepts the responsibilities for leadership of the safety and health program, for its effectiveness and improvement, and for providing the safeguards required to ensure safe conditions.
- Supervisors are responsible for developing proper attitude toward safety and health in themselves and in those they supervise, and for ensuring that all operations are performed with the utmost regard for the safety and health of all personnel involved, including themselves.
- Employees are responsible for wholehearted, genuine operation of all aspects of the safety and health program-including compliance with all rules and regulations and for continuously practicing safety while performing their duties.

(Signature(s) Founder(s) & Owner(s))

Assignment of Responsibility

The *Insert Job Title here* is responsible for and has authority over our safety and health programs. Management will give the *Insert Job Title here* full support in implementing and maintaining the safety and health programs.

(Signature(s) Founder(s) & Owner(s))

(Signature *Insert Job Title here*)



Identification AND Correction of Hazards

Insert Job Title here (Exec-lvl; eg Director of Safety and Health) along with any aids, consultants, or resources he/she needs will perform a hazard analysis using the Hazard Correction Work Order Matrix before any new process is performed, after any process is changed, and on a regular quarterly basis. First line employees and supervisors will detect hazards on a continuous ongoing basis and will perform a hazard analysis using the Hazard Correction Work Order Matrix whenever hazards are recognized. The Hazard Correction Work Order Matrix is included at the end of this section, in the appendix, and readily accessible in our hazard database by all employees at all levels at all times.

We will use a restricted access database to track all hazards and their status of control. Immediately upon being detected, all hazards will be communicated to the supervisor in charge of the area and entered into the hazard database along with their risk level, location, related process, team detected by, and controlled status. Pictures of hazards pre and post correction will be saved as deemed prudent by *Insert Job Title here (Director of Safety and Health)*. All employees will have access to review and add hazards to the hazard database at all times, but only *Insert Job Title here (Director of Safety and Health)* may remove or edit entries. *Insert Job Title here (Director of Safety and Health)* will be automatically notified of new hazard entries. *Insert Job Title here (Director of Safety and Health)* will further evaluate the hazard as needed, then use their authority to allocate the resources required to properly control the hazard in a timely fashion. If the first, second-, or third-line supervisors encountering the hazard have the know-how and resources to correct the hazard, they will do so without waiting for a response from *Insert Job Title here (Director of Safety and Health)*. Most hazards will be controlled with a collaborate effort from *Insert Job Title here (Director of Safety and Health)* and the supervisors dealing with the hazard.



Hazard Correction Work Order Matrix

		Hazard			
		Slight 1	Non Serious 2	Serious 3	Imminent Danger 4
P r o b a b i l i t y	Possible But Remote 1	1	2	3	4
	Reasonable But Unlikely 2	2	4	6	8
	Occasional 3	3	6	9	12
	Probable 4	4	8	12	16
	Frequent 5	5	10	15	20

Mishap Probability

1. Unlikely but possible
2. Occurs once in 3years
3. Occurs at least once per year
4. Occurs several times per year
5. Occurs any time

Hazard

1. Slight - No Injury or Equipment damage
2. Non-Serious - Controllable by operator or procedure
3. Serious - Causes injury or equipment damage
4. Imminent - Death; severe injury or major damage

Wrk Ord

- Period for Correction**
1. Immediate (ASAP)
 2. Correction W/In 14 Days
 3. Correction W/In 30 Days
 4. Correction as resources become available

Ensuring Employee Compliance

Safety Orientation: All new employees will be given a tour of the entire facility that contains their work environment. This tour will focus on informing the new employee of the location, nature, and risk of all hazards, and all hazard controls that are in place to keep them safe.

Ongoing training and retraining: Employees will routinely retrain or demonstrate their understanding of their safety training on a bi-annual basis.

Safety Training Schedule Rotation:

year	Winter	Summer
1	PPE	GHS, hazard identification and related company policies
2	PPE	Haz Mat, industrial hygiene
3	PPE	Ergonomics, walking working surfaces

Safety Incentive and Recognition Program: Safety effort will be reviewed as a part of all employees' performance review on a team/shift basis, and high performances of safety effort will be favored for non-monetary rewards/recognitions. Employees must work with their teams to earn higher safety effort performance; safety effort is assessed on each team/shift not individuals. This serves as first line employees' primary opportunity to demonstrate team-building and leadership skills to be recognized for promotion opportunities.

Disciplinary Action Plan: In an effort to eliminate unsafe acts and behavior from the workplace the disciplinary action plan will be strictly followed at all times.

Upon level 1 offense, employee will be stopped and informed of wrong doing.

Upon level 2 offense, employee will be stopped and retrained.

Upon level 3 offense, employee will be terminated.

Offense level will be determined by the supervisor encountering the unsafe act and/or behavior; supervisors will consider:

- the repetition of unsafe acts and/or behavior,
- the risk of unsafe acts and/or behavior,
- attitude towards unsafe acts, behavior, and/or the administrative safety controls,
- how unsafe acts and/or behavior are brought to supervisors' attention,
- and the context of unsafe acts and/or behavior when determining offense level.

Before the start of the next shift supervisors will have logged all offenses from the previous shift in the Offense Log. See Appendix D for example offense log.

Appendix D: Offense Log

Date	Offender	Offense	Level	Team/Shift	Process

Code of safe work practices: All administrative safety controls will be compiled for reference to eliminate any possible confusions. This list will be accessible by all employees all the time but may only be edited by *Insert Job Title here (Director of Safety and Health)*. See Appendix C.

Example Code of Safe Work Practices:

1. All persons shall follow these safe practice rules, render every possible aid to safe operations, and report all unsafe conditions or practices to the foreman or superintendent.
2. Foremen shall insist on employees observing and obeying every rule, regulation, and order as is necessary to the safe conduct of the work, and shall take such action as is necessary to obtain observance.
3. All employees shall be given frequent accident prevention instructions. Instructions shall be given at least every 10 working days.
4. Anyone known to be under the influence of drugs or intoxicating substances that impair the employee's ability to safely perform the assigned duties shall not be allowed on the job while in that condition.
5. Horseplay, scuffling, and other acts that tend to have an adverse influence on the safety or well-being of the employees shall be prohibited.
6. Work shall be well planned and supervised to prevent injuries in the handling of materials and in working together with equipment.
7. No one shall knowingly be permitted or required to work while the employee's ability or alertness is so impaired by fatigue, illness, or other causes that it might unnecessarily expose the employee or others to injury.
8. Employees shall not enter manholes, underground vaults, chambers, tanks, silos, or other similar places that receive little ventilation, unless it has been determined that is safe to enter.
9. Employees shall be instructed to ensure that all guards and other protective devices are in proper places and adjusted, and shall report deficiencies promptly to the foreman or superintendent.
10. Crowding or pushing when boarding or leaving any vehicle or other conveyance shall be prohibited.
11. Workers shall not handle or tamper with any electrical equipment, machinery, or air or water lines in a manner not within the scope of their duties, unless they have received instructions from their foreman.
12. All injuries shall be reported promptly to the foreman or superintendent so that arrangements can be made for medical or first aid treatment.
13. When lifting heavy objects, the large muscles of the leg instead of the smaller muscles of the back shall be used.
14. Inappropriate footwear or shoes with thin or badly worn soles shall not be worn.
15. Materials, tools, or other objects shall not be thrown from buildings or structures until proper precautions are taken to protect others from the falling objects.

Employee Communication

Daily Briefings: Insert Job Title here (Director of Safety and Health) will produce daily briefings for first line supervisors to go over with their teams at the start of every shift. Briefings will include which wear items are scheduled to be changed next and how much life is left in them, which wear items have been replaced/serviced most recently, and any changes or out of the ordinary happenings experienced by other shifts.

Daily De-Briefings: At the end of every shift, first line supervisors will complete a shift de-briefing form to be reviewed by Insert Job Title here (Director of Safety and Health). Any out of the ordinary happenings/observations will be recorded, including near-misses and references to any disciplinary offenses which will be recorded separately in the offense log. This daily de-brief is each shift's/ working group's secondary means of communicating to management, the primary being the hazard database. Any early warning signs, concerns, confusions, etc. that may not be immediately recognizable as a hazard will be communicated up the command chain in these de-briefings. See Appendix B for example de-brief form.

Employee Quarterly Safety Meeting: coinciding with the management led biannual retraining program, first line employees under their own direction (with no oversight from supervisors) will lead safety meetings for each other. By removing management oversight employees will feel more responsible for their own safety and will choose to focus on the safety and health concerns of greatest importance to them. In planning these meetings employees will communicate directly to Insert Job Title here (Director of Safety and Health) for access to any resources, such as outside experts, or video projection equipment, etc. to allow them to adequately cover whatever information the employees want to.

Employee Anonymous Reporting of Unsafe Condition/hazard Plan: If an employee does not feel comfortable communicating the existence of a hazard to their supervisor, they may enter the hazard information directly into the hazard database anonymously. All employees at all levels of the company will have access to the same login credentials for an 'anon' account, which will work off-site via internet connection, so any employee may enter hazard information into the hazard database without anyone else in the company knowing it was them. The logs associated with this anon account will be password protected by multiple passwords chosen by the sperate password bearers, so no single employee can attempt to trace anon account activity.

Corporate Safety Committee & Employee Safety Committee: Be mindful that 'committees' are defined in OSHA regulations. While regularly meeting committees are a very effective tool, paying citations because your committee strayed from OSHA requirements is not fun. Be sure to not use the word committee if you are doing something similar. Quarterly meetings in which management groups and employee groups alternate between meeting together and separately is a good strategy to allow communication both across working groups and up/down the command chain. Management controlling these meetings is a major pitfall to be

actively avoided; if nothing is done management will prevent employees from communicating and make the whole exercise moot.

Safety Posters, Signs, and Signals: No hazard shall ever be unmarked. Beyond the specific implementation of our Hazard Communication Program in full compliance with the GHS, areas containing atmospheric hazards (compressed gasses/liquids) will have their walls painted solid colors representing the present hazard; red for flammable gas, green for asphyxiating gas, if both are present the walls will be checkered both colors.

Appendix B: De-Brief Form

Date	Observation	Team/Shift	Process
1/1/22	Fixed gas detector went off for 10sec	Day	Hydrocarbon extraction
	Employee caught over tightening tri-clamps	Production team 2	crystallization



Employee Health & Safety Training

1. Employee Orientation

- a. All new employees will complete a tour of the entire facility that contains their work environment focused on informing the new employee of the location, nature, risk of all hazards, and the hazard controls that are in place to keep them safe.
- b. New employees must demonstrate understanding of all orientation training before beginning task training.
 - i. All employees will re-demonstrate understanding of orientation training at least annually.
- c. New employees will shadow competent employees until they have demonstrated understanding of the orientation training.
- d. Records of orientation training will include
 - i. Dates of training
 - ii. Nature of training
 - iii. Trainer, Name
 - iv. Other Trainees, Names
 - v. Nature of assessments
 - vi. Assessment performance demonstrating understanding
 1. Date of passing assessment
- e. Orientation training records for each employee will be maintained for at least five years after the employee's departure from the establishment.

2. All employees will receive training in their assigned tasks:

- a. Before the first time an employee performs the task,
- b. Whenever the task changes in anyway, and
- c. When the employee demonstrates in any way that they do not understand their prior training.
- d. New employees must demonstrate understanding of all task training before performing tasks unsupervised by a mentor.
 - i. All employees will re-demonstrate understanding of task training at least annually.
- e. New employees will complete tasks with direct supervision and mentorship until they have demonstrated understanding of their task training.
- f. Records of task training will include:
 - i. Dates of training
 - ii. Nature of training
 - iii. Trainer, Name
 - iv. Other Trainees, Names
 - v. Nature of assessments
 - vi. Assessment performance demonstrating understanding
 1. Date of passing assessment
- g. Task training records for each employee will be maintained for at least five years after the employee's departure from the establishment.

3. All employees must demonstrate an understanding of their orientation and task training before performing assigned tasks without direct supervision/mentorship and at least annually thereafter.
 - a. Understanding may be demonstrated by written, verbal, and / or practical assessment as deemed appropriate for the employee and task by their supervisor / mentor.
 - b. If an employee demonstrates that they do not / no longer / mis understand their training, they will no longer be allowed to complete relevant tasks without direct supervision/mentorship until they successfully demonstrate understanding again.
 - i. The date and the nature of the employee's demonstration of lack of understanding will be recorded in the employee's training record.
 - ii. Re-training will be performed as in sections (2) and (3) of this standard.

4. Training Records
 - a. Training records for each employee will be stored for at least five years after the employee's departure from the establishment.
 - b. The dates employees are in training or performing tasks under direct supervision and mentorship in the process of training will be recorded in the employee's training records.
 - i. Supervisors and mentors of tasks performed during training will be recorded if different from the employee's trainer.
 - c. See appendix A for template employee training record.

Appendix a: Example Employee Training Record

Example Employee Training Record							
Date	Training	Trainer	Other trainees	Assessment	Score	P/F	Notes
4/20/2020	PCR gel loading	Jane Doe	John Smith	Practical Exam	11/12	Pass	Sub-optimal gel loading due to operator errors in agar preparation.
4/21/2020	PCR gel loading	Jane Doe	John Smith	In Process		Fail	Insufficient separation and resolution of DNA bands due to operator error.
4/21/2020	PCR gel loading	Jane Doe		Verbal and Practical Exam	6/6 12/12	Pass	Learned well from mistakes

Injury and Illness Investigation Plan

Accident incident injury reporting: All work-related injury and illnesses requiring professional medical care and/or more than first aid will be recorded in an OSHA 300A form and appropriately posted February through April and annually reported to OSHA.

First aid treatment: Employee well being is our top priority; in the event of an accident all efforts will be made to immediately address any injuries and ensure employees receive whatever emergency care they require as quickly as possible. Local urban search and rescue and hazardous waste operations and emergency response (HAZWOPER) group direct emergency phone lines are kept on site and saved in all employee's personal phones; 911 will NOT be used in case of explosion or catastrophic spill, but the appropriate local Hazardous Waste Operations and Emergency Response (HAZWOPR) group will be contacted immediately.

Return to work: Employees will be given adequate time to recover and rehabilitate from accidents and injuries, both physically and mentally. If employees can no longer perform their job duties then they will be utilized in a different role. If there are no other roles available in the company, recruiting services will be provided to find the affected employee a new livelihood with equal or greater compensation.

Incident investigation: In response to near misses, at the discretion of *Insert Job Title here (Director of Safety and Health, Insert Job Title here (Director of Safety and Health* will lead an investigation into the root causes of the incident.

In response to events causing injuries and/or equipment damage, as soon as all injuries have been adequately addressed and it is safe to do so, any and all available employees will take pictures of the accident and record their own version of events in private, in whatever medium is easiest for them. Each employee will give copies of their pictures and story to *Insert Job Title here (Director of Safety and Health)* and maintain their own original copies. All of these pictures and stories will be made available to any third party, including government, investigators. *Insert Job Title here (Director of Safety and Health)* will lead our internal investigation in order to determine what needs to be changed, if anything, moving forward; the facility will not be repaired until any necessary changes, if any, have been identified and designed. At the discretion of *Insert Job Title here (Director of Safety and Health)* a private third-party investigation firm may be hired to assist in our investigation.

Record Keeping

Records will never be deleted. All records are stored on encrypted, password protected databases. Backups are stored offline, not connected to the internet. Backups are taken at least every week.



Ca/OSHA IIPP resources

- Model IIPP for high hazard industries
https://www.dir.ca.gov/dosh/dosh_publications/IIPP-Model-high-hazard.html
- IIPP overview https://www.dir.ca.gov/dosh/dosh_publications/IIPP.html#4