



Injury & Illness Prevention Program (IIPP)

Responsibility

The Injury & Illness Prevention Program (IIPP) administrator, **Hillary Lodge, Director of Human Resources**, has the authority and responsibility for implementing the provisions of this program for The Management Trust.

Management and all levels of employees are responsible for implementing and maintaining the IIPP in their work areas and for answering questions about the program. A copy of this IIPP is available on the [ESS](#) (Employee Self-Service) homepage.

This document is a supplemental resource to our Employee Safety Manual (also available on the [ESS](#)). These documents meet the requirements set forth by OSHA, **however both cannot be paper only programs – they must be put into practice each and every day**. Our goal is to make safety an everyday part of our culture, and therefore help keep our employees and our business safe.

Compliance

Management is responsible for ensuring that all safety and health policies and procedures are clearly communicated and understood by all employees. Supervisors 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 employees comply with the rules and maintain a safe work environment:

- Informing employees of the provisions of our IIPP
- Evaluating the safety performance of all employees
- Recognizing employees who perform safe and healthful work practices. This recognition is accomplished by:
 - Highlighting leadership in safety via employee communications
 - Implementing any and all effective suggestions and feedback for a safer working environment
 - Making safety an essential metric in all employee performance evaluations, and rewarding team members accordingly
 - Providing training to employees whose safety performance is deficient
 - Disciplining employees for failure to comply with safe and healthful work practices. Employees will receive disciplinary action, up to and including termination, if they fail to comply with Company rules.

- Other means that we use to ensure employee compliance with safe and healthful work practices include:
 - Providing comprehensive training at the time of hire and annually thereafter, or as needed per new laws and regulations
 - Holding (at least) quarterly Safety Committee meetings with Safety Champions, at which incidents and reported hazards are discussed with appropriate corrective action determined, to be remediated by set deadlines

Communication

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

- New employee orientation, including a discussion of site-specific safety and health policies and procedures
- Follow-through by supervisors to ensure efficacy
- Workplace-specific safety and health training
- Safety meetings held at least quarterly, and more frequently as deemed necessary by the creation of hazards or occurrence of injuries and illnesses
- Effective communication of safety and health concerns between employees and supervisors, including language translation where appropriate
- Posted and distributed safety information
- A system for employees to anonymously inform management about workplace hazards

Our organization elects to use a labor/management safety and health committee meeting for all 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 will be performed by **Hillary Lodge, Andrew Lloyd (Risk Management Consultant, Gallagher Bassett)**, and/or local safety personnel according to the following schedule:

- At least annually
- At least prior to beginning of work 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 employees to processes, operations, and/or tasks for which a hazard evaluation has not been previously conducted
- Whenever workplace conditions warrant an inspection

Periodic inspections consist of identification and evaluation of workplace hazards utilizing applicable sections of appropriate internal forms, and any other effective methods to identify and evaluate workplace hazards.

Accident Exposure/Investigation

Investigation of workplace accidents, hazardous substance exposures, and near-accidents/near-misses will be conducted by **Hillary Lodge, Andrew Lloyd (Risk Management Consultant, Gallagher Bassett)**, and/or local safety personnel and will include:

- Visiting the scene as soon as possible
- Interviewing affected employees and witnesses
- Examining the workplace for factors associated with the accident/exposure/near-miss
- Determining the causes of the accident/exposure/near-accident
- Taking corrective action to prevent the accident/exposure/near-miss from reoccurring
- Recording the findings and corrective actions taken on the OSHA Form 301

Hazard Correction

Unsafe or unhealthy work conditions, practices, or procedures at our work facilities will 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 employees from the area except those necessary to correct the existing condition. Employees necessary to correct the hazardous condition will be provided with the necessary protection.
- All such actions taken and dates they are completed will be documented on applicable sections of appropriate internal forms

Training & Instruction

All employees will receive training and instruction on general and job-specific safety and health practices. Training and instruction will be provided as follows:

- At least annually and/or per our training calendars (available on the [ESS](#))
- To all new employees
- To all employees 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 we become aware of a new or previously unrecognized hazard
- To supervisors to familiarize them with the safety and health hazards to which employees under their immediate direction and control may be exposed
- To all employees with respect to hazards specific to each employee's job assignment

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

- Explanation of our IIPP and all content within our Employee Safety Manual (including emergency action planning, workplace violence, fire prevention and electrical safety, job-specific safety precautions, how to report incidents, and a variety of additional related topics)
- 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 aisles clear, work areas neat and orderly, and promptly cleaning up spills
- Prohibiting horseplay and/or other acts that adversely influence safety
- Proper storage to prevent:
 - Stacking goods in an unstable manner
 - Storing materials and goods against doors/exits/extinguishing equipment/electrical panels, etc.

Where applicable our training may also include:

- Prevention of musculoskeletal disorders, including proper lifting techniques
- Use of appropriate clothing, including gloves, footwear, and Personal Protective Equipment (PPE)
- 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 employees 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 and maintain our IIPP. We have (10) or more employees and keep records as follows:

- 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 applicable sections of appropriate internal forms. These records are maintained for at least (1) year.

Please consult the **Employee Safety Manual**, and the **Safety** widget on the [ESS](#) homepage for full details of our safety program.