# Los Altos School District

# INJURY & ILLNESS PREVENTION PLAN

April 13, 2021

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## **PURPOSE AND AUTHORITY**

The Injury and Illness Prevention Plan (IIPP) is designed to allow for effective management of safety in the workplace and to ensure safe and healthful working conditions for all employees. Implementing each of the program elements will allow compliance with the IIPP Standard.

The IIPP is intended to establish a framework for Responsibilities, Compliance, Communication, Hazard Identification, Accident Investigation, Hazard Mitigation, Training, and Recordkeeping. With proper planning, organization, and practice, management can operate a safe work environment.

The plan should include the following:

- Identify person or persons with authority and responsibility for the program (DESIGNATION OF KEY PERSONNEL)
- Ensure employees comply with safe and healthy work practices (PROGRAM COMPLI-ANCE).
- Communication safety related materials to employees (COMMUNICATION).
- Identify workplace hazards (HAZARD IDENTIFICATION).
- Procedures to correct unsafe or unhealthy conditions in a timely manner (HAZARD MITI-GATION).
- Investigate accidents (ACCIDENT INVESTIGATION).
- Provide training (EMPLOYEE TRAINING).
- Allow employee access to the Program
- Document elements of the Program (DOCUMENTATION).

The LASD IIPP has been developed in response to Section 3203 of the California Code of Regulations Title 8 and Section 6401.7 of the California Labor Code.

The purpose of this program is to communicate to all LASD employees those occupational hazards associated with the workplace. This plan is available to all employees and sets forth policy concerning occupational hazards and seeks to provide all who are employed, information concerning occupational safety and health. It is the intent of this document to establish safety and health awareness among the employees of LASD.

# **DESIGNATION OF KEY PERSONNEL**

The ultimate responsibility for overseeing the development, implementation, and maintenance of the IIPP, rests with the Director of Student and Staff Services. The need to have individuals from the district responsible for these roles under the IIPP is necessary to insure the program is effective and functional.

The LASD) Injury and Illness Prevention Program Chain of Command is as follows:

# SAFETY COORDINATOR

Director of Student and Staff Services Coordinates with the district and sites as the designated District Safety Coordinator

#### INSPECTION COORDINATOR

Director of Maintenance and Operations Coordinates all inspections at the district sites

# TRAINING COORDINATOR

Human Resources Specialist & Director of Maintenance and Operations (Shared role) Coordinates with staff and sites regarding all district safety trainings

Persons assigned to these positions must follow designated responsibilities. These individuals should also strive to motivate employees to work using safe work practices.

The effectiveness of an IIPP is dependent on the selection of a qualified administrator. The **Safety Coordinator** shall be appointed by the LASD Administration. Communication of responsibilities to the district and schools is key to the success of the program.

The **Training Coordinator** shall be assigned to maintain safety training for all employees who require such training.

The Inspection Coordinator/Safety Ambassador is responsible for the overall workplace safety inspection program. The Inspection Coordinator/Safety Ambassador is tasked to identify workplace hazards. Administrators or Supervisors shall have the responsibility for their respective support function. The Inspection Coordinator/Safety Ambassador will be responsible for overseeing this process

**Employees** must fulfill certain responsibilities to assure the success of the Injury and IIPP. Each employee should act in a manner which protects his or her health and welfare as well as that of coworkers, other employees, visitors, students and the general public.

# LASD has established a Safety Committees for the following purpose:

- 1. To meet at least quarterly.
- 2. To prepare, distribute, and maintain written records of the meetings.
- 3. To review the results of periodic, scheduled workplace inspections.
- 4. Review investigations of occupational accidents, causes of incidents, and submit suggestions to prevent further incidents.
- 5. Review reports of hazardous conditions or work practices and assist with remedial actions.
- 6. Verify abatement action taken to abate OSHA citations.

# PROGRAM COMPLIANCE

The Safety Coordinator and Inspection Coordinator shall actively enforce safety rules, safe work practices, and the IIPP. The LASD IIPP is enforced through implementing system(s) to ensure that all employees comply with workplace safety and health practice through:

- Employee training and refresher training
- Quarterly District Safety Committee meetings
- Safe work practices
- Disciplinary actions

Compliance with this IIPP will also be achieved in the following manner:

1. The District Safety Committee, comprised of:

The Assistant Superintendent for Business Services Administrative Secretary for Business Services Director of Maintenance and Operations Director of Student and Staff Services

Human Resources Specialist

will set positive examples for working safely and require that all staff under their direction work safely. This includes ensuring that employees are provided training on specific job duties.

- 2. The Director of Student and Staff Services and Director or Maintenance and Operations will ensure that employees follow established safety policies and procedures. Performance evaluations, verbal counseling, written warnings, and other forms of disciplinary action are available.
- 3. The Assistant Superintendent for Business Services will identify the resources necessary to provide a safe work environment for their employees and include them in budget requests.
- 4. The Director of Student and Staff Services will establish appropriate means of recognition for employees who demonstrate safe work practices.

LASD will actively enforce the IIPP. An employee that fails to recognize safety rules and safe work practices, shall be disciplined. Any action taken will not violate employee rights under Cal/OSHA regulations and will be enforced in a non-discriminatory fashion. Disciplinary action (consistent with bargaining unit agreements) will include, but not be limited to, the following:

- 1. Retraining
- 2. Warning
- 3. Warning with reprimand placed in personnel file
- 4. Suspension from work with no compensation and record added to personnel file
- 5. Discontinue employment with record added to personnel file

Whenever an employee is recognized for a positive safety attitude, or whenever an employee is disciplined, the Safety Coordinator shall document the action taken.

## **COMMUNICATION**

The IIPP standard requires employers to explain the methods used to communicate safety matters. This communication occurs in several ways. LASD may communicate safety matters in the following ways:

- 1. Safe Work Practices
- 2. Safety Training (live and online)
- 3. Safety Meetings
- 4. Through the Safety Committees
- 5. Employee Bulletin Board, Flyers, Posters, etc.
- 6. Access to the Written IIPP

Communication is a two-way process. LASD therefore recognizes that employees must be given the opportunity to communicate safety issues to management. To this end, LASD agrees not to take any action against an employee for identifying workplace safety issues.

Employees wishing to point out potential safety hazards should utilize the Unsafe Conditions Form. This form is available in the Administration, Maintenance and Operations, individual Departments and on the District Website (can be submitted online) and can be submitted anonymously. (If this is the case we need to add this to website)

Once a form is filled out, a copy should be given to the Inspection Coordinator and the original forwarded to the Safety Coordinator. It may be hand delivered, given to office personnel, emailed, or mailed. The Inspection Coordinator shall initiate inspection and corrective actions upon receipt of this form. Corrective action will be made available for public viewing. Completed forms shall be retained in appropriate files.

Under no circumstances shall LASD allow reprisal for an employee that submits an Unsafe Conditions Form. As part of the employee recognition policy, LASD shall take into consideration an employee's willingness to identify hazards in the workplace.

The LASD IIPP is located in the office of the Director of Student and Staff Services.

From time to time, management may distribute flyers concerning safety matters to employees. These flyers may be distributed during work hours, attached to payroll checks, emailed, mailed or posted to the District Website. All employees shall carry out all communications in a manner understandable.

Safety Training is an important method of communication. Supervisors are required to maintain records of Safety Meetings and Training and provide copies to Human Resources.

# **UNSAFE CONDITIONS FORM**

THIS FORM IS TO BE USED BY EMPLOYEES THAT HAVE IDENTIFIED HAZARDS NOT PREVIOUSLY RECOGNIZED. THIS FORM BRINGS THE HAZARD TO THE ATTENTION OF THE MANAGEMENT.

NOTICE IS HEREBY GIVEN THAT THE USE OF THIS FORM OR OTHER REPORTS OF UNSAFE ACTS OR CONDITIONS ARE PROTECTED BY LAW [8 CCR, SECTION 3203].

IT IS ILLEGAL FOR THE EMPLOYER TO TAKE ACTION AGAINST AN EMPLOYEE FOR MAKING SUCH A REPORT. THE EMPLOYER MUST INVESTIGATE THE REPORT AND EXPLAIN TO EMPLOYEES THE ACTION TAKEN AND ANY SUBSQUENT ACTIONS AS NECESSARY.

DATE:		EMPLOYEE NAME (OPTIONAL):
DESCRIPTION OF HA	AZARD:	
DOSCIBLE CALISES EC	OD THE HAZADD	
POSSIBLE CAUSES FO	OK THE HAZAKD:	
POSSIBLE WAYS TO	CONTROL OR ELIMINA	'E HAZARD
SUPERVISOR HAS BE	EN NOTIFIED: YES	1NO
OCT ER VIOLETTI IO DE		
LOCATION OF HAZA	ARD:	
ANY IMMEDIATE AC	TION TAKEN BY EMPLO	OYEE REPORTING:
DAME DECEMBE	DECEMBED DV	GOVERN A DAMED TO THE DAME OF
DATE RECEIVED:	RECEIVED BY:	COMPLAINT INSPECTED:
		ON IMPROVEMENT LOG
HAZARD CLASSIFICA	AHON;	
PRIORITY NUMBER:		Dean / Administrator original to Safety Coordinator

## **HAZARD IDENTIFICATION**

The foundation of the LASD IIPP is the identification of workplace hazards. By planning, many accidents can be prevented.

The Injury and Illness Prevention Standard requires that the employer implement a system of identifying and evaluating workplace hazards. This system for LASD includes facility inspections and employee feedback.

A workplace inspection program is essential in order to reduce unsafe conditions that may expose faculty, staff, students, and visitors to incidents that could result in personal injuries or property damage. It is the responsibility of the Director of Maintenance and Operations to ensure that systematic safety inspections are conducted as appropriate.

There are two types of inspections; overall facility inspections and specific work area inspections. For the purpose of the LASD IIPP, the following inspections are to be conducted:

- 1. The overall facility inspection will be performed annually and when:
  - a. any new substances, processes, procedures, or equipment are introduced to the work-place that have occupational hazard potential.
  - b. a previously unrecognized hazard is discovered.
  - c. an accident or illness occurs.
- 2. Specific work area inspection by the Director of Maintenance and Operations periodically, but not less than annually.

All inspections must be documented and the Inspection Coordinator must maintain a file of this documentation. A sample inspection sheet is attached to this section and also available on the district website. These forms are not meant to be all-inclusive. Work conditions will change over time, and so should inspection methods.

Any employee may report an unsafe condition and reporting can be anonymous. The Unsafe Condition Form is available in all school and district offices and on district website.

# **INSPECTION SHEET**

WORK ARE	A INSPECTION		FACILTY IN	NSPECTION
MONTH/YI	EAR:			
INSPECTED	D BY:			
the facility an	d work area inspections. Foartment File and to Mainto	ection requirements of this properties this log in a location coenance and Operations. Tak	nvenient to the person insp	ecting. Maintain copies
DATE	WORK AREA	EQUIPMENT	CONDITION	REMARKS

Copy to Maintenance and Operations

# **HAZARD MITIGATION**

Identified hazards shall be corrected in a timely manner. The IIPP Standard clearly requires that employer's correct safety deficiencies in a timely manner according to the severity of the hazard. Furthermore, whenever a hazard poses immediate danger, employees must be protected from injury.

The Inspection Coordinator shall be responsible for the correction of any hazard and must be notified when a hazard exists and given management support to pursue adequate correction of the hazard. LASD recognizes that action must be taken to correct safety deficiencies.

Whenever a hazard is identified, it shall be assigned to one of two categories. These categories are:

- Immediate Danger to Persons or Environment
- Less Serious Hazards

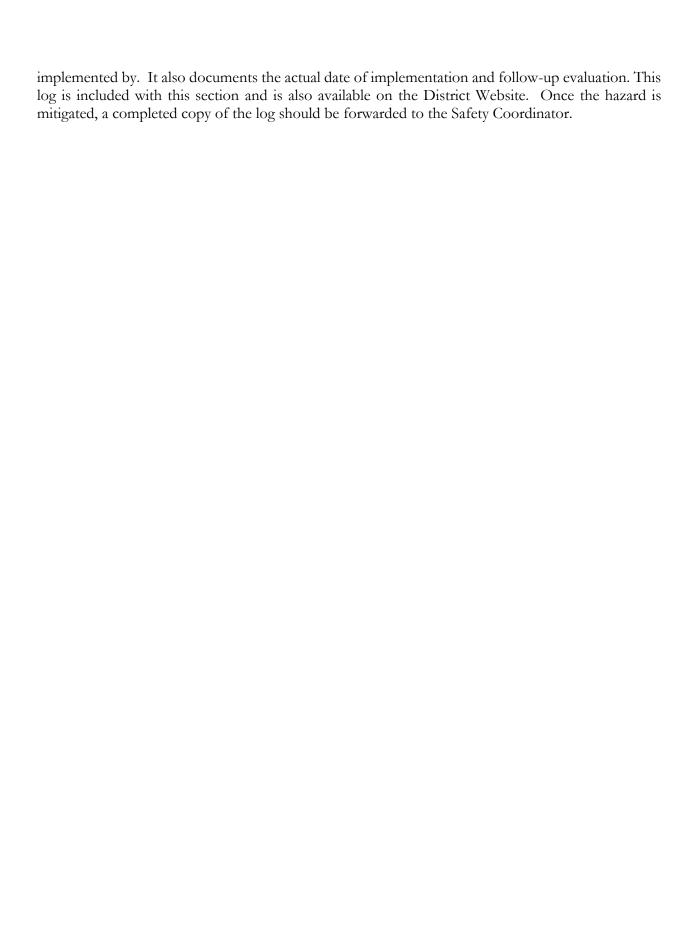
In a situation where a hazard poses immediate danger to human health or the environment, the Safety Coordinator must coordinate with the assistance of others the following:

- 1. Notify and evacuate all personnel to a safe area.
- 2. Notify appropriate authorities.
- 3. Do not allow employees back to deal with the hazard unless they are afforded proper protection.
- 4. Take steps to abate the hazard, diminishing further threat to human life or the environment.
- 5. Clean up and legally dispose of any hazardous substances involved in the incident.
- 6. Take corrective action to eliminate hazard.
- 7. Evaluate what happened and the effectiveness of the corrective action.
- 8. Train affected employees and document actions taken.

Whenever a less serious hazard is identified, the Safety Coordinator shall coordinate corrective actions in a timely manner according to the severity of the hazard. For less serious hazards, the following steps must be taken:

- 1. Identify hazard and determine severity
- 2. Remove employee from work station if necessary.
- 3. Mark any machinery or equipment that the hazard is associated with indicating to others that a hazard exists.
- 4. Determine what corrective action is necessary.
- 5. Prioritize the corrective action according to severity and with other corrective actions required elsewhere in the facility.
- 6. Acquire management and budgetary support for corrective action.
- 7. Implement corrective action.
- 8. Modify safe work practices and training as necessary.
- 9. Train affected employees.
- 10. Document action taken.
- 11. Evaluate the effectiveness of the corrective action and document this evaluation.

The Hazard Mitigation Log is to be utilized to prioritize safety deficiencies according to severity, establish who will be responsible for the corrective action, and by what date the action must be



# HAZARD MITIGATION IMPROVEMENT LOG

This log is to be used to record hazards when identified and the corrective action to be taken, which is responsible to take the action, when it must be completed by, and the actual completion date. Each hazard is to be categorized by hazard classification. Based on the classification, the hazards shall be prioritized according to severity.

CLASS A HAZARDS	Any condition or practice with potential for causing loss of life or body part and/or extensive loss of structure, equipment or material.			
CLASS B HAZARDS	Any condition or practice with potential for causing serious injury, illness or property damage, but less severe than Class A Hazards.			
CLASS C HAZARDS	Any condition or practice with probable potential for causing non-disabling injury or illness or non-disruptive property damage.			
HAZARD CLASSIFICA	TION AND PRIORITY			
INCASE CONDITION	LOD DD A CTICE			
UNSAFE CONDITION	OR PRACTICE			
CORRECTIVE ACTION	N			
PERSON RESPONSIBI	E FOR CORRECTION			
TEMOST TEEST OF TOTAL				
DATE TO BE COMPLE	ETED BY	ACTUAL COMPLETION DATE		
REMARKS				
талидите.				
	Copy to Safety Coordin	nator and Inspection Coordinator		

# **ACCIDENT INVESTIGATION**

The IIPP Standard requires that employers implement a method of investigating workplace injury or illnesses. The Direct Supervisor will be responsible for conducting the initial accident or incident investigation. The Direct Supervisor and the Safety Committee will conduct a review of the investigations as appropriate. Procedures for investigations of occupational injury, illness, or exposure to hazardous substances, will cover the following:

- a) What should be reported
- b) Who does the initial investigation
- c) Who does the follow-up investigation
- d) Who receives copies of the report(s)
- e) When legally required reports must be completed

Employees are responsible to report accidents immediately to their Supervisor. Direct Supervisors will investigate accidents, injuries, occupational illnesses, and near-miss incidents, to identify the causal factors or hazards immediately and use the following form to document the investigation.

Timely and thorough accident investigation is an integral part of the overall Injury and Illness Prevention Program. The accident report is intended to fact-find not fault-find. The purpose is to determine the primary and contributing causes of the accident so that appropriate action can be taken to prevent recurrence. With this in mind, any employee conducting an accident investigation should utilize the following guidelines:

- 1. If possible, discuss the accident at the scene.
- 2. Interview witnesses.
- 3. Show concern for the employee's injury.
- 4. Explain why the investigation is necessary.
- 5. Allow the injured or involved employee to relate his or her account of the accident without interruption.
- 6. Reiterate a summary of the accident to assure proper and complete understanding of the employee's story.
- 7. Use tact in resolving any discrepancies in the employee's story.
- 8. If appropriate, discuss means of preventing recurrence and record all findings and actions taken on the Accident Investigation Form.

In the event of a serious incident, the Human Resources, Business Services or Maintenance and Operations staff will assist with the investigation, bringing in outside experts if needed. Appropriate repairs or procedural changes will be implemented promptly to mitigate the noted hazards.

All occupational injuries, illnesses, or exposures to hazardous substances must be reported to Human Resources or Business Services within 24 hours after the incident becomes known to the Supervisor. For those injuries that cause an amputation, loss of an eye, or any serious degree of permanent disfigurement, that requires inpatient hospitalization other than medical observation or diagnostic testing but does not include any injury or illness or death caused by an accident on a public street or highway, unless the accident occurred in a construction zone, Human Resources or Business Services will contact Cal/OSHA within 8 hours.

The Accident Investigation form is included with this section and is also available on the District Safety Website. A copy of the Accident Investigation form must be forwarded to Human Resources and the Business Office.

# LASD INCIDENT ACCIDENT INVESTIGATION REPORT

# TO BE COMPLETED BY THE SUPERVISOR

	LAST				FIRST				MIDDLE
DDRESS:							TELEPHONE		
	STREET		CITY	STAT	Е	ZIP			
OB TITLE:					SEX		DATE OF BIR	ТН	
NSTRUCTOR/SUPER	VISOR NAME:	-					-		
erson involved i	S:	STUDENT		STAFF	VISITOR		OTHER		
ATE OF INCIDENT	ACCIDENT:	-			HOUR	-	PHOTOS	YES / (Circle	
ATE REPORTED:		-			HOUR	-	-	(enex	. Che,
NCIDENT/ACCIDEN	T LOCATION:								
ITNESSES: NAMES	, addresses, te	LEPHONE NU	MBERS:						
1_									
2_									
IME NOTIFIED:			AM / PM	TIME ON SCEN	Е	_AM / PM	TIME OFF	SCENE	AM / PM
			(Circle One)			(Circle One)			(Circle One)
escribe in detail the	location of inc	c <b>ident</b> : includ		ELD INVESTI		r, measure	nents, and an	y other cond	dition that coul
Exact Location of a Describe in detail the nave contributed to constributed to constribute the incide	e location of inc or prevented the i	eident: incluencident:	ding lightir	ıg, walking sur	ace, weathe		nents, and an	y other cond	dition that could
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Describe in detail the	e location of inc or prevented the i	eident: includ ncident: hich you ob:	ding lightir	ng, walking sur	ace, weathe		nents, and an	y other cond	dition that could
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## **EMPLOYEE TRAINING**

Training is a key element of the LASD IIPP. This is a requirement of the standard and a form of communicating safety related materials to the employees. The training program is intended to train and instruct employees about the IIPP, general safety/healthy work practices, and specific instructions with respect to each employee's job assignment. It is the most effective tool at management's disposal to control workplace hazards.

All supervisors must ensure that the personnel they supervise receive appropriate training on the specific hazards of work they perform and the proper precautions for protection against those hazards.

Training is particularly important for new employees and whenever a new hazard is introduced into the workplace. Such hazards may include new equipment and hazardous materials or procedures. Training is also required when employees are given new job assignments on which they have not previously been trained and whenever a supervisor is made aware of a new or previously unrecognized hazard.

Training for LASD will occur at the following times:

- 1. Before a new employee begins work.
- 2. Any employee transferred or given a new assignment.
- 3. Whenever a new substance, process, procedure, or equipment, which poses a new hazard, is introduced to the workplace.
- 4. Whenever a new hazard is identified, following an inspection or investigation.

Management must be knowledgeable on the hazards exposed to employees under their jurisdiction and corrective/preventative measures. Management assign and ensure completion of appropriate training for employees based on job duties.

Training will occur in the following applications, as appropriate:

- 1. District wide training sessions.
- 2. Safety Meetings.
- 3. Individual employee training for specific job tasks.
- 4. Through Keenan SafesSchools Online training.

Training is an on-going process that will focus on specific employee jobs and procedures. The main point to safety training is to prevent unsafe situations, procedures, or acts. Always document any training, regardless of length or importance. Example Training Logs are included with this section and should be completed when safety training is provided. Copies of the completed training logs should be forwarded to Human Resources. The live trainings can be tracked on the Keenan SafeSchools Online Training Program.

# GENERAL SAFETY TRAINING RECORD LOG

SUBJECT COVERED		
LOCATION OF TRAINING:		
DATE OF TRAINING:	NAM	E OF TRAINER
		CYCN A HIVING
EMPLOYEES NAME/DEPARTMENT (print)		SIGNATURE

Copy to Human Resources

# EMPLOYEE SAFETY TRAINING JOB SPECIFIC

NAME OF EMPLOYEE	JOB CLASS
DATE OF TRAINING:	NAME OF TRAINER
SUBJECT COVERED	
LOCATION OF TRAINING	
UTILIZED THE FOLLOWING-  □ CODE OF SAFE PRACTICES  □ INSPECTION CHECKLIST  □ ACCIDENT INVESTIGATION	☐ JOB HAZARD ANALYSIS ☐ MATERIAL SAFETY DATA SHEET ☐ OPERATIONS MANUAL
OTHER:	
SUMMARY OF THE TRAINING	
THE EMPLOYEE WAS:  ☐ TOLD THE UNSAFE, PROCEDURE ☐ SHOWN PROPER METHOD	☐ ABLE TO PRACTICE SAFE METHOD☐ CORRECTED WHILE PRACTICING
DURING DEMONSTRATION AND PRACTICE:  ☐ KEY POINTS WERE HIGHLIGHTED  ☐ ERRORS WERE CORRECTED	☐ HAZARDS WERE IDENTIFIED ☐ QUESTIONS AND ANSWERS
REMARKS	
THE EMPLOYEE ACKNOWLEDGES:  ☐ THE REASON FOR TRAINING  ☐ TO PRACTICE SAFETY AND MAINTAIN SAFI	☐ UNDERSTANDS TOPIC DISCUSSED E CONDITIONS IN THE WORKPLACE
EMPLOYEE'S NAME/DEPARTMENT (print)	SIGNATURE

Copy to Human Resources

# EMPLOYEE ACCESS TO THE PROGRAM

All employees have the right and opportunity to receive and review their employer's IIPP. LASD will provide access to the Program by doing one of the following:

- 1. Provide access in a reasonable time, place, and manner, but in no event later than five business days after the request for access is received from an employee or designated representative.
  - One printed copy of the plan must be free of charge, although the employer may charge a reasonable administrative fee for additional copies within (1) year of the previous request and the Program has not been updated with new information since the prior copy was provided
- 2. Provide unobstructed access through a company server or website, which allows an employee to review, print, and email the current version of the Program.

The District will communicate the right and the procedures to access the Program to all employees.

Employees of LASD can receive and review our IIPP by making a written request themselves or designating an authorized representative that they give written authorization to make the request on their behalf. The written authorization request must include:

- The name and signature of the employee who is authorizing a designated representative to access the Program on their behalf
- The name of the designated representative authorized to receive the Program for the employee
- The date of the request
- The date when the written authorization will expire (if less than (1) year).

# RECORDKEEPING

Recordkeeping is critical for demonstrating the effort of LASD towards safety and program implementation.

Many standards and regulations of Cal/OSHA contain requirements for the maintenance and retention of records for occupational injuries and illnesses, medical surveillance, exposure monitoring, inspections, and other activities relevant to occupational health and safety. To comply with these regulations, as well as to demonstrate that the critical elements of this IIPP are being implemented, the following records will be kept on file in the listed Department for at least the length of time indicated below:

- 1. Copies of IIPP Safety Inspection Forms, Unsafe Conditions Form and Hazard Mitigation Log. Retain for 2 years and maintained by Departments and Maintenance and Operations.
- 2. Copies of Accident Investigation Forms. Retain for 2 years by Assistant Superintendent for Business Services.
- 3. Copies of Employee Training Sign-in Sheets and related training documents. Retain for duration of each individual's employment by Human Resources.
- 4. Copies of Safety Postings and Safety Committee Meeting Minutes and Agendas. Retain 2 years by Human Resources.
- 5. Copies of Employee Exposure Records, or other required Employee Health and Safety Records. Retain for 30 years or for the duration of each individual's employment, if greater than 30 years. These records will be maintained in Human Resources.

The Safety Coordinator will be responsible for ensuring that all relevant records are completed and kept as required by this program and/or Cal/OSHA. A safe and healthy workplace is the goal of everyone at LASD with responsibility shared by management and staff alike.