



Attachment A

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The City of Corona **INJURY AND ILLNESS PREVENTION PROGRAM**



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ATTACHMENTS

REFERENCES

Title 8, California Code of Regulations, Section 3203 (Injury and Illness Prevention Program)

Title 8, California Code of Regulations, Section 6406 (Responsibilities and Duties of Employers and Employees)

Title 19, California Code of Regulations, Section 2755.7 (Incident Investigation)

1.0 INTRODUCTION

1.1 Background Information

State of California, Department of Industrial Relations, Division of Occupational Safety and Health (Cal-OSHA) regulations require that employers establish, implement, and maintain an effective Injury and Illness Prevention Program (IIPP) that is designed to prevent, control, and eliminate hazardous or potentially hazardous workplace conditions. The program must be in writing and include at least the following specific elements:

- | | |
|---------------------|--------------------------|
| • Responsibilities | • Incident Investigation |
| • Compliance | • Hazard Correction |
| • Communication | • Training |
| • Hazard Assessment | • Recordkeeping |

This written IIPP is intended to protect the City of Corona's employees from workplace hazards and to meet the requirements of Title 8, California Code of Regulations Section 3203 (T8, CCR, §3203).

1.2 Safety Value

The City of Corona is committed to providing a safe and healthy workplace for its employees. Without question, a focus on health & safety must be part of every operation, and it is every individual's responsibility at all levels in the organization. This is accomplished by:

- Encouraging individuals to report safety concerns and to hold each other accountable for safe work practices;
- Empowering each other to act, respond and be willing to ask questions when in doubt;
- Promoting safe work practices;
- Providing a safe working environment by designing, building and operating safe facilities;
- Identifying and providing timely safety training and proper equipment for all staff;
- Implementing safety standards into projects and procedures; and
- Recognizing employees who contribute to our culture of safety.

1.3 Scope

This IIPP applies to all City employees, as well as temporary agency personnel. A list of additional health and safety programs can be found on the Enterprise Health and Safety (EHS) management platform which will be updated as programs are developed or revised.

2.0 DEFINITIONS

Accident: An unexpected and unintentional event that causes injury or illness to people and/or damage to property

Field Employee: An employee whose routine duties involve work outside of a typical office environment.

Hazard: An unsafe practice, procedure, or condition that, if left uncontrolled, might contribute to an accident/incident.

Imminent Hazard: A hazard that poses an immediate danger of death, serious harm, or bodily injury.

Incident: An occurrence that may result in occupational injury, illness, death, or property damage that has health and safety implications. An incident may also include property damage, minor injury, a "near miss" with serious safety or health concerns, or loss of productivity.

Near Miss: An unplanned event that did not result in injury, illness, or damage but had the potential to do so. Examples include slips on wet surfaces that do not result in injury, chemical spills that do not result in exposures, etc.

Safety Data Sheets (SDSs): Documents that are required to be provided by the manufacturers of chemicals/substances that may be used in the workplace for the purpose of providing pertinent hazard information (e.g., physical hazards, health hazards, emergency response procedures, etc.).

Serious Injury or Illness: With regard to reporting to Cal/OSHA, a serious injury or illness is defined as one involving:

1. Inpatient hospitalization, regardless of length of time, for other than medical observation or diagnostic testing;
2. Amputation;
3. Loss of an eye; or
4. Serious degree of permanent disfigurement.

Vehicle: Any City fleet vehicle, including personal vehicles used to conduct City business, as well as types of motorized equipment.

3.0 RESPONSIBILITIES

3.1 City Manager

The City Manager in conjunction with Department Heads shall be ultimately responsible for the safety efforts of the City of Corona. In order to achieve this, the City Manager shall:

- Provide direction for the City's safety program;
- Discuss significant incidents and make suggestions on recommended improvements in safety programs; and
- Hold personnel accountable for safety.

3.2 Chief Talent Officer

The Chief Talent Officer with the cooperation of the Department Heads shall be the primary liaison to the City Manager for the safety efforts of the City. In order to achieve this, the Chief Talent Officer shall:

- Be responsible for overseeing the Safety Division;
- Be involved in safety program changes and program implementation;
- Review, along with the Occupational Health & Safety Manager, significant accident investigations and make any necessary recommendations; and
- Work with Department heads to hold employees accountable, through the Occupational Health & Safety Manager, for safety and loss control.

3.3 Human Resources Department, Safety Division

The Occupational Health & Safety Manager is the program administrator and has the authority and responsibility for implementation of this IIPP. The Safety Division shall be available to provide health and safety consultation and technical assistance as requested by all levels of staff. Additional responsibilities include:

- Ensuring this IIPP remains current and in compliance with new or changing regulations;
- Performing routine audits to evaluate compliance with this IIPP;
- Reviewing the Physical Conditions Inspection and other safety inspection forms;
- Supporting the incident investigation process and reviewing all incident investigation reports, including corrective action recommendations;
- Reviewing injury/illness records to track, analyze, and report on incident prevention performance;
- Establishing and coordinating the Department Safety Representative Program;
- Providing employee safety training; and
- Maintaining central safety-related records.

3.4 Department Heads

Department Heads shall be responsible for the implementation of this IIPP in their respective departments and require all employees comply with the requirements contained herein. Additional responsibilities include:

- Ensuring health and safety practices are consistently being adhered to throughout their departments;
- Providing positive recognition to employees who consistently perform safe and healthful work practices;
- Including safety performance as part of annual performance reviews; and
- Demonstrating that while safety is everyone's duty, it is a function of senior management to ensure a safe working environment.

3.5 Supervisory Positions

All individuals working in a supervisory capacity, including leads, shall be responsible for the implementation of this IIPP in their respective work areas and to ensure employees working under their direction abide by the elements within this IIPP. Specific responsibilities include:

- Giving sincere, active, and consistent support to safety-related procedures, functions, etc.;
- Enforcing safety rules, regulations, and procedures and working with Human Resources on disciplinary action for those knowingly violating established safety practices;

- Encouraging prompt reporting of safety concerns by staff without fear of reprisal;
- Assessing and identifying potential hazards associated with specific operations, equipment, etc.;
- Continuously reviewing safe operating procedures to verify an adequate level of protection against potential hazards;
- Conducting safety inspections in accordance with Section 6.3;
- Conducting incident investigations, including near-miss incidents;
- Responding to reports of workplace hazards and ensuring corrective actions are promptly taken;
- Ensuring the correct personal protective equipment (PPE) is provided and properly utilized when required;
- Reinforcing safety-related communications on relevant health and safety matters;
- Ensuring employees receive instruction and training to safely perform their duties; and
- Ensuring employees under their supervision attend training and safety meetings.

3.6 Employees

All City employees shall be responsible for:

- Following general safe work practices and specific safety procedures;
- Wearing proper personal protective equipment (PPE) in designated areas, and as required for their duties and hazard exposures;
- Safely operating equipment and machinery for which they have been properly trained and authorized;
- Promptly reporting workplace hazards, injuries/illnesses, vehicle accidents, and near misses to their immediate supervisor; and
- Participating in required training, safety meetings, and other learning opportunities.

4.0 ENSURING COMPLIANCE

All City employees are responsible for complying with safe work practices. Our system of ensuring that all workers comply with these practices include:

- Informing employees of the provisions of this IIPP;
- Evaluating the safety performance of all employees;
- Recognizing employees who perform safe and healthy work practices;
- Providing ongoing training and learning opportunities to employees; and
- Disciplining employees for failure to comply with safe work practices.

5.0 COMMUNICATING SAFETY

All health and safety programs, including this IIPP, can be readily accessed and printed from the Administrative Policy Library and the Enterprise Health and Safety (EHS) management platform. In addition, hard copies will be provided upon request.

City employees shall receive relevant health and safety information through a combination of safety meetings, training, written correspondences, e-mails, postings, and any other form of communication that is readily understandable to all employees. Employees are also encouraged to utilize the various means of communication available to provide feedback and raise any pertinent issues. This includes a system for the anonymous notification of safety hazards as outlined in Section 5.6.

5.1 Department Safety Representative Program

To assist with the overall implementation of this IIPP and provide an additional mechanism for communicating safety, a Department Safety Representative (DSR) Program has been established. Responsibilities of DSR's can be found in Administrative Policy 01600.003 *Department Safety Representative Program*.

5.2 Safety Meetings

Based on the safety needs of each department, supervisors or leads shall conduct safety briefings (tailgates) for jobs involving multiple people or disciplines prior to the start of work. Topics can include safe work procedures for the activities being performed, PPE requirements, reminders on environmental hazard, or any other safety-related information pertaining to the job or tasks being performed.

Regular staff meetings should include a summary of incidents and any corrective actions for the respective department, including information on updated safety programs or procedures. All safety and tailgate meetings shall be documented for recordkeeping purposes and kept with the respective department's files with a copy to the Safety Division.

5.3 Training

All individuals working in a supervisory capacity, including leads, shall ensure employees under their supervision receive instruction and training on the hazards and safe operating procedures associated with their specific duties. In the event more comprehensive training on a specific topic is needed (e.g., to offer greater expertise on a topic and/or to meet regulatory requirements), additional training will be coordinated through the Safety Division. In those cases, the Safety Division shall administer a comprehensive safety training program based on specific needs of an individual and their potential hazard exposure.

5.4 Written Correspondences and Postings

Employees may also receive pertinent health and safety information in various written formats, including, but not limited to, memos, e-mail messages, operating manuals, container labels, SDSs, and bulletin board postings.

SDSs shall be maintained and made readily accessible to all affected employees in accordance with the City of Corona's Hazard Communication program.

Copies of equipment operating manuals shall be maintained by the respective department and made available to all employees who operate the equipment.

5.5 Addressing Safety Concerns

Employees with job safety concerns can reach out to the Safety Division to investigate the matter. Their immediate supervisor should also be notified and be given the opportunity to address the concern.

5.6 Anonymous Notification of Hazards

Safety-related notifications and concerns can be expressed anonymously at any time using the anonymous electronic reporting form found on the Human Resources, Safety Division Atwork intranet site.

6.0 HAZARD ASSESSMENTS

The City will identify, evaluate, and control workplace hazards including, but not be limited to, conducting Process Hazard Analyses (PHAs), conducting job hazard assessments, performing safety inspections, and reviewing incident data for trend analysis.

Inspections will be conducted to identify and evaluate hazards whenever:

1. New substances, processes, procedures or equipment which present potential new hazards are introduced into our workplace;
2. New, previously unidentified hazards are recognized; and
3. Whenever workplace conditions warrant an inspection.

The Safety Division shall be notified whenever any of the situations listed above presents itself so that an assessment can be conducted.

6.1 Job Hazard Assessments

Job Hazard Assessments (JHAs) will be conducted on various jobs tasks. Priority will be given to tasks with the highest injury or illness rates and those with the potential to cause severe or disabling injuries or illness, even if there is no history of previous accidents.

The Safety Division will also coordinate industrial hygiene, indoor air quality, and other surveys as necessary.

6.2 Safety Inspections

Periodic safety inspections shall be conducted by the Safety Division, managers, supervisors, DSR's or their designee, in areas of their responsibility using the Inspections Checklist found in the EHS safety management platform.

Immediate hazards will be promptly addressed, and all other deficiencies will be assigned a priority based on a hazard classification.

Copies of safety inspections will be retained by the Safety Division for 5 years.

6.3 Hazard Classification

Hazards shall be classified into the following categories to prioritize corrective actions that cannot be immediately addressed, as well as to classify certain job tasks.

Severity	Probability				
	Frequent	Likely	Occasional	Seldom	Unlikely
Catastrophic	E	E	H	H	M
Critical	E	H	H	M	L
Marginal	H	M	M	L	L
Negligible	M	L	L	L	L

Probability

- Unlikely – Unlikely to occur (<3% chance)
- Seldom – Not likely to occur but possible (between 3 and 10% chance)
- Occasional – May occur in time (between 10 and 50% chance)
- Likely - Quite likely to occur in time (between 50 and 90% chance)
- Frequent – Likely to occur immediately or in a short period of time (>90% chance)

Severity

- Negligible – Minimal threat to safety, health, and well-being of individuals
- Marginal – May cause minor injury, illness, property damage, financial loss and/or result in negative publicity
- Critical – May cause serious injury or illness, major property damage, significant financial loss, and/or result in negative publicity
- Catastrophic – May result in death

Risk Level

- Extreme (E) – Immediate action required to eliminate the hazard

- High (H) – High likelihood of occurrence and a potential impact on the organization. These risks pose significant threats to the organization and require immediate attention and resources to address.
- Moderate (M) – Reasonable steps must be taken to develop risk management strategies even though there is no hurry to have such risks sorted out early. Such risks do not require extensive resources. Rather, they can be handled with smart thinking and logical planning
- Low (L) – Usually do not pose any significant problem. However, if some reasonable steps can help in alleviating the risks, such steps should be taken to improve overall performance of the task/project

6.4 Incident Data Review

The Safety Division shall maintain injury/illness and vehicle incident data to identify incident trends. Such records shall be reviewed periodically and assessed for process improvements.

7.0 INCIDENT INVESTIGATION

All incidents must be reported by the affected employee(s) to an immediate Supervisor or Manager as soon as possible after the occurrence.

7.1 Medical Treatment

If medical treatment beyond first aid is needed, the injured party shall be taken to the nearest hospital or medical center. The Safety Division and Risk Management shall be immediately notified if an employee requires emergency medical care or is transported to a medical facility via ambulance/paramedics.

If non-emergency medical treatment is needed or desired by the employee, the employee shall be transported or directed to go to the designated health clinic.

7.2 Incident Reporting

All work-related incidents involving employees, including near misses, shall be reported in accordance with the following guidelines:

1. Managers/Supervisors shall complete an incident report on the Enterprise Health and Safety (EHS) management platform. If neither one can complete the report in a timely manner, the affected employee shall complete the incident report. All incident reports will be reviewed by the affected employee's Supervisor and the Safety Division. The Incident Report must be completed on the Enterprise Health and Safety (EHS) management platform within 24 hours of the incident for injuries/illnesses, vehicle accidents, and near misses.
2. The supervisor of an injured employee shall ensure Risk Management is notified so that they can provide the employee with appropriate documentation for incidents beyond first aid.

The Safety Division shall immediately be notified of a serious injury or illness (including amputation or loss of eye), or death and will be responsible for reporting to Cal-OSHA within 8-hours of knowledge but no later than 24-hours if exigent circumstances exist.

7.3 Root Cause Analysis

Managers/Supervisors of affected employees shall be responsible for ensuring all incidents are investigated, including developing corrective actions to prevent or minimize reoccurrence using the Incident Investigation Form on the Enterprise Health and Safety (EHS) management platform. The Safety Division will assist and review all reports for feedback and comments. The following procedures shall be used when performing the investigation:

- Conduct the investigation as soon as possible following the occurrence to preserve the scene and interview victims and/or witnesses while the events and facts are still fresh in their mind(s);
- Take photographs;
- Thoroughly examine the scene to determine causative factors (e.g. equipment factors, environmental factors, etc.);
- Review established procedures, including the use of any personal protective equipment, to determine if the procedures were followed and whether they were adequate;
- Review training records of affected employees;
- Establish causative factors based on the evidence gathered; and
- Develop corrective actions necessary to prevent similar incidents/near misses from occurring in the future.

Managers/Supervisors shall be responsible for ensuring corrective actions are implemented in a timely manner. Affected employees, as well as employees who could be affected, shall be informed of any corrective actions taken that involve procedural changes.

8.0 CORRECTION OF WORKPLACE HAZARDS

Identified hazards shall be corrected by supervisors and/or managers of affected employees using the preferred order of corrective actions to best control hazardous workplace exposures (these are listed in section 8.2). Corrective Actions will be documented in connection with a Safety Suggestion or Hazard Reporting Form, Supervisor Incident Investigation Report, Facility or Equipment Inspections, or verbal reports of imminent hazards.

8.1 General Guidelines

Potentially affected employees shall be informed of existing hazards and projected corrective action completion dates.

If a corrective action cannot be taken immediately, interim measures shall be put in place until a permanent measure can be implemented. Examples of interim measures may include:

- Locking and tagging out unsafe equipment (e.g. “Caution – Do Not Operate”) until repaired;
- Stopping unsafe work practices until appropriate training or re-training can be performed; and
- Barricading areas that have chemical spills until the spills are cleaned up.

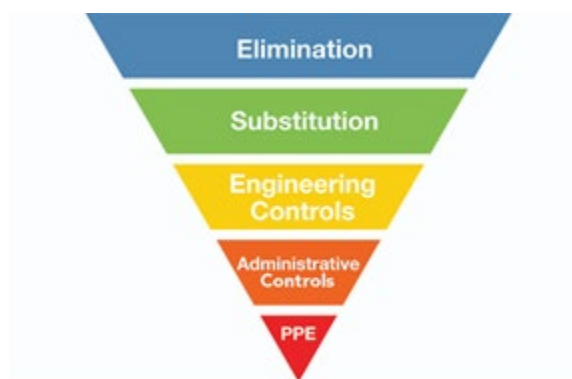
Hazards that cannot be immediately corrected or controlled should be referred to senior management.

The Safety Division shall be available to provide guidance in controlling and correcting hazards.

8.2 Hierarchy of Controls

The following hierarchy of controls shall be considered and implemented in the order listed below to correct or control hazards:

1. Elimination: Physically removing a hazard is the most effective hazard control.
2. Substitution: This is the second most effective hazard control, which involves replacing something that produces a hazard with something that does not produce a hazard.
3. Engineering Controls: This is the third most effective means of controlling hazards. These do not eliminate hazards, but rather isolate people from hazards.
4. Administrative Controls: These are changes to the way people work such as procedural changes, employee training, and installation of signs and warning labels. Administrative controls do not remove hazards, but limit or prevent people's exposure to the hazards.
5. Personal Protective Equipment: This method is the least effective and shall be used as a last resort if there are no other effective means to control the hazard.



8.3 Imminent Hazards

If an imminent hazard exists that cannot be corrected immediately, the operation must halt and not resume until the necessary corrective actions are taken.

If the hazard cannot be corrected without endangering personnel or property, the affected area shall be cleared of all personnel except those essential to abate the hazard.

Essential personnel shall be provided with the necessary safeguards during the performance of any corrective actions.

9.0 TRAINING & LEARNING

Employees shall receive health and safety information, training, and learning opportunities through a combination of a) specific instruction provided by their supervisors and/or managers, b) learning opportunities presented during routine safety meetings (in accordance with the guidelines in sub-section 5.2, "Safety Meetings", of this IIPP), and c) participation in training courses on specific topics applicable to one's job duties. All such training shall be provided at no cost to employees on the City's time and shall be documented.

9.1 Safety Training

Awareness of potential health and safety hazards, as well as knowledge of how to control such hazards, is critical to maintaining a safe and healthful work environment and preventing injuries, illnesses, and accidents in the workplace. The City is committed to instructing all employees in safe and healthy work practices. To achieve this goal, the City will provide training to each employee with regard to general safety procedures and with regard to any hazards or safety procedures specific to that employee's work assignment. Training will be provided as follows:

- Upon being hired;
- Whenever an employee is given a new job assignment for which training has not previously been provided;
- Whenever new substances, processes, procedures or equipment which represent a new hazard are introduced into the workplace;
- Whenever the City is made aware of a new or previously unrecognized hazard; and
- Whenever the City Manager, Chief Talent Officer, Occupational Health and Safety Manager, or Supervisor believe additional training is necessary.

9.2 Supervisor Training

Supervisors at all levels shall attend training specific to their roles and responsibilities under various safety programs. The training shall provide an overview of this IIPP, as

well as information on other health and safety programs (e.g., Hazard Communication, Emergency Procedures, etc.).

The Safety Division shall also be available on an ongoing basis to consult with or instruct supervisors at all levels on how to familiarize themselves with the hazards faced by employees working under their direction.

9.3 Supplementary and Refresher Training

Supervisors shall ensure their employees receive additional instruction and training whenever changing work conditions pose new hazards (e.g., when new substances, procedures, equipment, or job sites are introduced) or when previously unrecognized hazards are discovered.

All employees shall receive refresher training on relevant topics through regular safety meetings, which can be in-class, in the field, or online. Such training may occur because of a regulatory requirement, change in programs or procedures, or whenever an employee's performance reveals a need for remedial training.

10.0 RECORDKEEPING

Records of the actions taken towards the implementation of this IIPP shall be maintained in accordance with the guidelines presented below.

- Reports of unsafe conditions or hazards, including any corrective actions taken, shall be maintained for at least five years.
- Records of periodic scheduled inspections, including any identified unsafe conditions or practices and corresponding corrective actions, shall be maintained for at least five years.
- Incident Investigation Reports, including any corrective actions taken, shall be maintained for at least five years.
- Hazard Correction Reports used to document completion of corrective actions shall be maintained for at least five years.
- Employee training records shall be maintained throughout the duration of employment plus no less than three years following the termination of employment. All training records will be centrally maintained in the Human Resources Learning Management System.
- All safety records shall be centrally maintained in the Safety Division's EHS system unless arrangements are made with other departments.