INJURY AND ILLNESS PREVENTION POLICY

Pathways Academy Adult Education ("PAAE" or "Charter School") adopts this Illness and Injury Prevention Program ("IIPP") as PAAE is committed to maintaining a safe and healthful working environment. The IIPP is designed to prevent workplace accidents, injuries, and illnesses. A complete copy of the program will be maintained by PAAE. Employees will be provided a copy of the plan upon hire, annually, and any changes to the plan will be posted on PAAE's website.

PAAE recognizes that the majority of employees perform work remotely from home or other non-PAAE-controlled locations. For purposes of this IIPP, a remote worksite is defined as an employee's designated home workspace or other approved remote location.

PAAE's responsibility for remote worksites is limited to hazards directly related to the performance of job duties and does not extend to general household conditions. Employees are responsible for maintaining a safe and healthful remote workspace, following ergonomic guidance, and promptly reporting any work-related hazards, injuries, or illnesses.

It is the intent of PAAE to comply with all laws relating to occupational safety and health. Management will provide all necessary safeguards, programs, and equipment required to reduce the potential for accidents and injuries. To further increase workplace safety, PAAE requires the active participation and assistance of all employees. The policies and procedures contained in this IIPP are mandatory. Employees must be constantly aware of conditions in all work areas that can produce injuries or illness. No employee is required to work at a job that they know is not safe and are encouraged to inform their supervisor of any potentially hazardous situation or condition that is beyond the employee's ability or authority to correct. No employee will be discriminated against for reporting safety concerns to management.

It is the responsibility of each employee to support PAAE's safety program and to perform in a manner that assures personal safety and the safety of others, including students and families, visitors and other trades. To be successful in this endeavor, all employees on every level must adopt proper attitudes towards injury and illness prevention. Every employee must also cooperate in all safety and health matters, not only between management and employees, but also between coworkers. Only through such an effort can any safety program be successful. PAAE's objective is to implement a safety program that will reduce the total number of injuries and illnesses to an absolute minimum. Employees should contact the Executive Director for assistance regarding this policy.

This Injury and Illness Prevention Program is reviewed at least annually and whenever changes in operations, staffing, or regulatory requirements occur.

Injury and Illness Prevention Program

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Code of Safe Practices

General Safety Rules

1. All persons shall follow this Code of Safe Practices and render every possible aid to ensure safe school operations.

2. Failure to abide by the Code of Safe Practices may result in disciplinary action up to and including termination.

3. Employees are to immediately report any unsafe conditions, accidents, injuries or illness to their supervisor.

4. If an employee is unsure of the safe method to do your job, STOP and ask your supervisor. Ignorance is no excuse for a safety violation.

5. No one shall be knowingly permitted to work while their ability or alertness is impaired by fatigue, illness, and prescription or over the counter drugs. Employees who are suspected of being under the influence of illegal or intoxicating substances, or impaired by fatigue or an illness, shall be prohibited from working.

6. Anyone known to be under the influence of any drugs or intoxicating substances which impair the employee's ability to safely perform the assigned duties shall not be allowed on the job.

7. Horseplay, scuffling, fighting and other acts that tend to have an adverse influence on workplace safety or employee well-being are prohibited.

8. Work shall be well-planned and supervised to prevent injuries in the handling of materials and operating equipment.

9. The work area must be kept clean and free of debris, electrical cords and other hazards.

10. Employees must immediately clean up spilled liquids.

11. Do not attempt to operate equipment until you are fully trained and authorized.

12. Employees may never bring firearms, weapons, illegal drugs or alcoholic beverages on school facilities.

13. Employees may not block exits, fire doors, aisles, fire extinguishers, first aid kits, emergency equipment, electrical panels, or traffic lanes.

14. Employees may not leave tools, materials, or other objects on the floor that might cause others to trip and fall.

15. Employees may not distract others while working. If conversation is necessary while performing duties involving risk to safety, make sure eye contact is made prior to communicating.

Fire Prevention and Housekeeping

The following office safety and fire prevention practices apply to PAAE-controlled worksites and in-person school events. For remote employees, these practices apply only to hazards directly related to work activities and do not impose responsibility on PAAE for general household safety conditions.

1. Employees must always take precautions to prevent fires.

2. All discharged, damaged or missing equipment is to be immediately reported to a supervisor. Tampering with fire equipment is prohibited.

3. Access to fire extinguishers must be kept clear at all times in School offices. Supervisors and staff must make note of the location of the nearest fire extinguisher in the work area.

4. Smoking is prohibited within twenty (20) feet from School offices or events.

5. In case of fire, employees shall consider the safety of themselves and other individuals before saving property.

6. Work areas must be kept free of debris. Useless or unnecessary material must be removed from the work area to help reduce tripping hazards that could impede evacuation.

7. Employees must maintain awareness of potential hazards when walking about the work site.

8. Employees must keep materials and equipment out of walkways and stairways at all times.

9. Sharp wires or protruding nails must be reported to the supervisor.

General Duties and Responsibilities for Safety

A safe working environment can only be achieved and maintained when there is active interest, participation, and accountability at all levels of the organization. To ensure this, PAAE delegates the following safety duties by job title. Please keep in mind that this is not an all-inclusive list. In some cases employees will need to perform safety duties outside their regular responsibilities to prevent accidents.

INJURY AND ILLNESS PREVENTION PLAN

Executive management must plan, organize, and administer the program by establishing policy, setting goals and objectives, assigning responsibility, motivating subordinates, and monitoring results. Management will support and maintain an ongoing IIPP through the following:

1. Providing clear understanding and direction to all staff regarding the importance of safety through the development, implementation, monitoring and revision of policy and procedures.

2. Ensuring that adequate funds are budgeted for the purchase of necessary safety materials, safety equipment, proper personal protective equipment, adequate time for employee safety training, and maintenance of tools and equipment.

3. Overseeing development, implementation, and maintenance of the IIPP and other required safety programs.

4. Maintaining an organizational commitment to accident prevention by expecting safe conduct on the part of all supervisors and employees.

5. Holding all levels of management and employees accountable for accident prevention and safety.

6. Reviewing all accident investigations to determine corrective action.

Supervisors play a key role in the prevention of accidents on the job. They have direct contact with the employees and know the safety requirements for various jobs. Safety responsibilities for these individuals include:

1. Enforce all safety rules in the IIPP and ensure safe work procedures.

2. Verify corrective action has been taken regarding safety hazards and accident investigations.

3. Conduct periodic documented inspections of the administrative office and employee work spaces to identify and correct unsafe actions and conditions that could cause accidents.

4. Act as a leader in school safety policy and set a good example by following all safety rules.

5. Become familiar with local, state, and federal safety regulations.

6. Correct unsafe acts and conditions that could cause accidents.

7. Communicate with all employees about safety and accident prevention activities.

8. Correct the cause of any accident as soon as possible.

9. Ascertain that first aid materials and fire extinguishers are maintained and used when conditions warrant its use.

10. Maintain good housekeeping conditions at all times.

11. Investigate all injuries and accidents to determine their cause and potential corrective action.

12. Ascertain that all injuries involving employees requiring medical attention are properly treated and promptly reported to the office.

The Executive Director and Human Resources act as a safety resource for PAAE, monitors staff training, is responsible for maintaining program records, and works with outside agencies regarding the safety program and its contents. Additional duties include:

1. Coordinate all loss prevention activities as a representative of management.

2. Act as a consultant to management in the implementation and administration of the policies set forth in this IIPP.

3. Develop and implement loss prevention policies and procedures designed to ensure compliance with the applicable rules and regulations of all federal, state, and local agencies.

4. Review all accident reports to determine cause and preventability.

5. Conduct periodic reviews of the program and job spaces to evaluate performance, discuss problems and help solve them.

6. Consult with representatives from insurance companies in order that the IIPP aligns with loss control services.

7. Review workers' compensation claims and help supply the insurance carrier with information about injured employees in order to keep loss reserves as low as possible.

Every employee is responsible for working safely, both for self-protection and for protection of fellow workers. Employees must also support PAAE's safety efforts. Specific employee safety responsibilities include:

1. Asking a supervisor for assistance when unsure how to do any task safely.

2. Reading and abiding by all requirements of the IIPP.

3. Reporting all accidents and injuries, no matter how minor, to the supervisor immediately.

4. Reporting any safety hazards or defective equipment immediately to their supervisor.

5. Remaining clear of the possession or the influence of alcohol or controlled substances while on the premises.

6. Never engaging in horseplay or fighting.

7. Participating in, and actively supporting, the safety program.

Office Safety

Office accidents can and do happen. To prevent them, PAAE has developed the following rules for the office staff. PAAE will also endeavor to include office employees in periodic safety meetings. If at any time an employee believes there is a safety hazard, they must notify their supervisor immediately.

1. Report all accidents and injuries, no matter how minor, to your supervisor immediately.

2. Correct or report any safety hazards that you observe.

3. Clean up any spilled material that may present a slipping hazard.

4. Do not stretch any cords across aisles that may present a tripping hazard.

5. Do not climb on shelves or stand on chairs; you must use a step stool or ladder.

6. Keep all legs of the chair on the floor. Do not lean or tilt chairs back while sitting in them.

7. No one shall be in the possession of, or under the influence of, alcohol or other intoxicating substances while on the premises.

8. No horseplay will be tolerated.

9. Close file drawers when not in use. Do not open more than one file drawer at a time. This could cause the cabinet to tip.

10. Do not store heavy objects above your head that could fall on you in an earthquake.

11. Do not store flammable or combustible materials near heaters or other heat sources.

12. If you are unsure how to do any task safely, ask your supervisor.

13. Do not operate any equipment you are not trained and authorized to use.

14. Always follow safe lifting procedures when lifting any object and get help for heavy loads by doing the following:

    - Bend your knees, not your back.
    - Keep the load close to your body.

- Keep your back straight.
- Lift with your legs.
- Do not lift and twist.
- Get a second person to help, or use equipment when lifting heavy objects.

Office Ergonomics

Studies have shown over the years that poorly designed and arranged work areas and repetitive motions can lead to a variety of injuries including carpal tunnel syndrome and tendonitis, which are often referred to as repetitive motion injuries ("RMI"). In order to minimize the possibility of developing an RMI, employees should consider the following risk factors:

1. The force used to perform a task;
2. Posture while performing tasks;
3. The number of repetitions performed in a given time period; and
4. Mechanical stresses such as hard surfaces.

Proper Adjustments to Office Equipment

The most significant RMI risk factor in office environments is poor body posture caused by improper workstation design or layout. Employees are encouraged to sit in a neutral position to minimize joint stress and the potential for an RMI. When sitting in a chair in neutral position, the employee's knees should be kept at a ninety-degree angle position, hands, arms and wrists are in line and parallel to the floor, feet rest completely on the floor (unless a footrest is used), the head faces forward, elbows are kept close to the body and bent at an angle of ninety to one hundred and twenty degrees, the employee's back is against the seat back of the chair, and thighs and hips rest comfortably on a seat parallel to the floor.

Employees are encouraged to contact the Executive Director for support.

Hazard Identification and Evaluation

The following procedures are to assist in the identification and correction of hazards. These procedures are representative only and are not exhaustive of all the measures and methods that will be implemented to guard against injury from recognized and potential hazards in the workplace. As new hazards are identified and improved work procedures developed, they will be promptly incorporated into our IIPP.

Loss Analysis

Periodic loss analyses will be conducted by Human Resources. These will help identify areas of concern and potential job hazards. The results of these analyses will be communicated to management and employees through safety meetings and other appropriate means.

Accident Investigations

All accidents and injuries will be investigated in accordance with the guidelines contained in this program. Accident investigations will focus on all causal factors and corrective action including the identification and correction of hazards that may have contributed to the accident.

Employee Suggestions

Employees are encouraged to report any hazard they observe to their supervisor. No employee of PAAE will ever be disciplined or discharged for reporting any workplace hazard or unsafe condition in good faith. However, employees who do NOT report potential hazards or unsafe conditions that they are aware of will be subject to disciplinary action.

Outside Agencies

Several organizations may assist us in identifying hazards in our workplace. These include: safety officers from other contractors, insurance carrier safety and health consultants, private industry consultants, the fire department, or Cal/OSHA Consultation.

Periodic Safety Reviews

For remote employees, hazard identification will be conducted through a combination of employee self-assessments, reported concerns, incident investigations, and review of injury and illness trends.

- Physical safety inspections will be conducted only for PAAE-controlled locations and during in-person school events or gatherings. Remote employees may be asked to complete a workstation safety or ergonomics checklist when reasonably necessary.

Documentation of Inspections

Safety inspections will be documented to include the following:

1. Date on which the inspection was performed;
2. The name and title of person who performed the inspection;
3. Any hazardous conditions noted or discovered and the steps or procedures taken to correct them; and
4. Signature of the person who performed the inspection.

All safety-related records shall be maintained for the period required by applicable Cal/OSHA, workers' compensation, and recordkeeping regulation.

Hazard Correction

The following procedures will be used to evaluate, prioritize and correct identified safety hazards. Hazards will be corrected in order of priority, with the most serious hazards being corrected first.

Hazard Evaluation

Factors that will be considered when evaluating hazards include:

- Potential severity (the potential for serious injury, illness or fatality);
- Likelihood of exposure (the probability of the employee coming into contact with the hazard);
- Frequency of exposure (how often employees come into contact with the hazard);
- Number of employees exposed;
- Possible corrective actions (what can be done to minimize or eliminate the hazard); and
- Time necessary to correct (the time necessary to minimize or eliminate the hazard).

Techniques for Correcting Hazards

1. **Engineering Controls**: Could include machine and equipment handling. These are the first and preferred methods of control.

2. **Administrative Controls**: The next most desirable method would include rotation of employees or limiting exposure time.

3. **Personal Protective Equipment**: These are often the least effective controls for hazards and should be relied upon only when other controls are impractical.

Documentation of Corrective Action

Designated staff will prepare and submit a Monthly Site Safety Checklist to document any hazards. All corrective action taken to mitigate hazards will be documented. All hazards noted on safety inspections will be rechecked on each subsequent inspection and notations made as to their status.

Bloodborne Pathogen Exposure Control Plan

PAAE has determined that routine occupational exposure to bloodborne pathogens is limited and primarily associated with in-person activities, emergency response situations, or specific job duties. The provisions of this Exposure Control Plan apply only to employees whose job responsibilities reasonably anticipate contact with blood or other potentially infectious materials.

INJURY AND ILLNESS PREVENTION PLAN

Human Resources, or designee, shall establish and maintain the following Exposure Control Plan designed to protect employees from possible infection due to contact with bloodborne pathogens, including human immunodeficiency virus (HIV) and hepatitis B virus (HBV). This plan will be reviewed annually and made available to staff. PAAE will use work practice controls to eliminate or minimize employee exposure, and will regularly examine and update those controls.

A bloodborne pathogen means pathogenic microorganisms that are present in human blood and can cause disease in humans (OSHA Regulations Standard 29 CFR).

Occupational exposure is defined as any "reasonably anticipated skin, eye, mucous membrane, or parenteral contact with blood or potentially infectious materials that may result from the performance of an employee's duties." (8 CCR 5193)
Examples of school job classifications in which employees may experience occupational exposure include teachers and paraeducators. These employees are potentially occupationally exposed because they may provide first aid or may clean up spills or equipment that is contaminated.

All personnel will have completed the SafeSchools Bloodborne Pathogens course in order to prevent exposure. School staff who are potentially occupationally exposed to bloodborne pathogens will be provided with training so they learn how to avoid becoming exposed, be given personal protective equipment such as gloves or masks, and offered a Hepatitis B vaccine at no cost to them. Employees having contact with blood or other bodily fluids are required to wear disposable gloves, wash their hands with soap and water, and disinfect any equipment or work areas that are affected.

Procedure
Clean up of bodily fluids may be performed by staff, the student, or the parent/guardian of a minor as appropriate based on the circumstances. Staff should follow the protocol of the site where the cleanup is needed (test site, field trip, etc.) and must report any incident involving bodily fluids to their supervisor. Each staff member will be equipped with a first aid kit and will be replaced as necessary.

1. In the event of a serious injury resulting in the release of blood or other bodily fluids which could contain pathogens (e.g., HIV or HBV), the first step is to treat the injured party.
2. Spilled body fluids should not be cleaned up without the appropriate protective equipment and materials specifically designated for such fluids. In the case where spilled body fluids need clean-up, this procedure must be followed:
    - If there is a need for a clean up in a public location, school personnel should first inquire if the site has designated an individual responsible.
    - If there is not a responsible individual at a public location, the employee must notify the most senior school employee on duty. The employee should assess the

situation to determine if clean up is needed, and the steps to complete the cleaning.

- Procedure to clean up the spilled fluids:
  - Prevent others from becoming exposed by securing the area.
  - Put on disposable gloves.
  - Wipe up the fluids with paper towels and place the soiled towels into a leak-proof plastic bag.
  - Spray surface(s) with an appropriate disinfectant cleaner and wipe the area with paper towels or use the solution provided in the Emergency First Responder pack. Follow the disinfectant product instructions for time on the surface and removal.
  - Place all potentially contaminated materials in a leak-proof plastic bag.
  - Sweep/mop-up any additional neutralized/absorbed fluids and place in the leak-proof plastic bag.
  - Disinfect all surfaces and equipment used in the clean-up.
  - Remove gloves from inside-out and place in the plastic bag. Do not reuse disposable gloves.
  - Secure the bag, place it in a second leak-proof plastic bag, and discard it in the trash.
  - Wash hands thoroughly in hot, soapy water for at least twenty (20) seconds.
  - Flush mucous membranes with water immediately or as soon as feasible following contact with potentially infectious materials.

3. After all activity is completed, an Incident Report is to be completed as necessary and submitted to Human Resources.

Hepatitis B Vaccination

The hepatitis B vaccination series shall be made available at no cost to all employees who have a risk of occupational exposure. The hepatitis B vaccination shall be made available unless the employee has previously received the complete vaccination series. Employees are to use their paid medical benefit through PAAE to access the vaccination. If the employee does not qualify or does not utilize the paid medical benefits through PAAE, they should contact human resources for support.

Employees who decline to accept the vaccination shall sign the Hepatitis B declination statement (Appendix B).

Post-Exposure

Any employee exposed to a bodily fluid while performing job responsibilities who has not received the Hepatitis B vaccine will be encouraged to receive the series within 24 hours of exposure.

Safety Communication

This section establishes procedures designed to develop and maintain employee involvement and interest in serving on safety committees to review and provide feedback on PAAE's Injury and Illness Prevention Program and School Safety Plans and procedures. These activities will also ensure effective communication between management and employees on safety related issues that are of prime importance to PAAE.

The following are some of the safety communication methods that may be used:

1. Periodic safety meetings with employees that encourage participation and open, two-way communication.

2. New employee safety orientation and provision of the Code of Safe Practices.

3. Written communications from management or human resources, including memos, postings, payroll stuffers, and newsletters.

Employees will be kept advised of highlights and changes relating to the safety plan. Management shall relay changes and improvements regarding the safety plan to employees, as appropriate. Employees will be involved in future developments and safety activities, by requesting their opinions and comments, as necessary.

All employee-initiated safety related suggestions shall be properly answered, either verbally or in writing, by the appropriate level of management. Unresolved issues shall be relayed to the administrative assistant for distribution to the appropriate manager.

All employees are encouraged to bring any safety concerns they may have to the attention of management. PAAE will not discriminate against any employee for raising safety issues or concerns.

PAAE maintains a system for anonymous reporting of workplace safety concerns. Employees may submit concerns anonymously by contacting Human Resources via email, phone, or other designated reporting methods communicated to staff. Reports will be reviewed promptly and corrective action will be taken as appropriate.
Phone: (619) 371-5017
Email: hrhelp@pathwayscharterschool.org

Employee Safety Training

PAAE is committed to instructing all employees in safe and healthful work practices. Awareness of potential hazards, as well as knowledge of how to control them, is critical to maintaining a

safe and healthful work environment and preventing injuries. To achieve this goal, we will provide training to each employee on general safety issues and safety procedures specific to that employee's work assignment.

Such training provides the following benefits:

- Makes employees aware of job hazards;
- Teaches employees to perform jobs safely;
- Promotes two (2) way communication;
- Encourages safety suggestions;
- Creates interest in the safety program; and
- Fulfills Cal/OSHA requirements.

Every new employee will be given instruction by their supervisor in the general safety requirements of their job. A copy of our Code of Safe Practices shall also be provided to each employee.

Managers, supervisors, and employees will be trained on various accident prevention topics.

Employee training will be provided at the following times:

1. All employees will receive safety training per board policy.

2. All new employees will be given a copy of this IIPP (which includes our Code of Safe Practices) and PAAE's Safety plan, and will be required to read and sign for them.

3. If applicable, all employees given a new job assignment for which training has not been previously provided will be trained.

4. Whenever new substances, processes, procedures or equipment that represent a new hazard are introduced into the workplace.

5. Whenever PAAE is made aware of a new or previously unrecognized hazard.

6. Whenever management believes that additional training is necessary.

7. After all serious accidents.

8. When employees are not following safe work rules or procedures.

Training topics may include, but not be limited to:

- Employee's safety responsibility;
- General safety rules;
- Code of Safe Practices;

- Safe job procedures;
- Ergonomics;
- Safe lifting;
- Emergency procedures; and
- Contents of safety program

Emergency Medical Services and First Aid

PAAE prioritizes the safety and well-being of its employees in all work settings. For employees working remotely, emergency medical services are accessed through local emergency responders (e.g. 911). Employees working remotely should seek immediate medical assistance as needed and notify their supervisor and Human Resources as soon as practicable following any work-related injury or illness. For in-person events and gatherings, the School will ensure that emergency medical services are readily available for its employees if the work is done onsite.

Accident Procedures

These procedures are to be followed in the event of an employee injury in the course of employment.

1. For severe accidents call 911 and request the Paramedics.

2. Employees must report all work-related injuries to their supervisor immediately, even if they do not feel that it requires medical attention. Failure to do so may delay Workers' Compensation benefits, and the employee may face disciplinary action.

3. The supervisor should consult with the employee to determine whether or not outside medical attention is needed. When uncertainty exists on the part of any individual, the employee should be sent for professional medical care.

4. If medical attention is not desired or the employee refuses treatment, the employee must still fill out a Workers' Compensation Claim Form and Notice of Potential Eligibility DWC-1 form in case complications arise later.

5. In all cases of injury or illness, if the employee cannot transport themselves for any reason, PAAE will contact the employee's emergency contact for transportation or contact 9-1-1 if appropriate.

6. In the event of a serious accident involving hospitalization for more than twenty-four (24) hours, amputation, permanent disfigurement, loss of consciousness or death, phone contact should be made with the office at (619) 371-5017. Contact must also be made with the nearest Cal/OSHA office within eight (8) hours of the incident.

Accident Investigation

The supervisor or other designated individual will investigate all work-related accidents in a timely manner. This includes minor incidents and "near accidents," as well as serious injuries. An accident is defined as any unexpected occurrence that results in injury to personnel, damage to equipment, facilities, or material, or interruption of normal operations.

Responsibility for Accident Investigation

Immediately upon being notified of an accident, the supervisor with support from Human Resources shall conduct an investigation. The purpose of the investigation is to determine the cause of the accident and corrective action to prevent future recurrence, not to fix blame or find fault. An unbiased approach is necessary in order to obtain objective findings.

The Purpose of Accident Investigations

1. To prevent or decrease the likelihood of similar accidents.
2. To identify and correct unsafe work practices and physical hazards. Accidents are often caused by a combination of these two factors.
3. To identify training needs. This makes training more effective by focusing on factors that are most likely to cause accidents.

What Types of Incidents Do We Investigate?

- Fatalities
- Serious injuries
- Minor injuries
- Property damage

Procedures for Investigation of Accidents

1. Visit the accident scene, as soon as possible, while facts and evidence are still fresh and before witnesses forget important details and to make sure hazardous conditions to which other employees or students/families could be exposed are corrected or have been removed.

2. Provide for needed first aid or medical services for the injured employee(s).

3. If possible, interview the injured worker at the scene of the accident and verbally "walk" them through a re-enactment. All interviews should be conducted as privately as possible. Interview all witnesses individually and talk with anyone who may have additional information regarding the incident.

4. Report the accident to the insurance carrier within twenty-four (24) hours. All serious accidents will be reported to the carrier as soon as possible.

5. Consider taking signed statements in cases where facts are unclear or there is an element of controversy.

6. Thoroughly investigate the accident to identify all accident causes and contributing factors. Document details graphically. Use sketches, diagrams and photos as needed. Take measurements when appropriate.

7. All accidents involving death, disfigurement, amputation, loss of consciousness or hospitalization for more than twenty-four (24) hours must be reported to Cal/OSHA immediately.

8. Focus on causes and hazards. Develop an analysis of what happened, how it happened, and how it could have been prevented. Determine what caused the accident itself, not just the injury.

9. Every investigation will also include an action plan that includes an assessment of how such accidents can be prevented in the future.

10. In the event a third party or defective product contributed to the accident, save any evidence as it could be critical to the recovery of claim costs.

Accurate and prompt investigations ensure information is available, help to correct causes quickly, help identify all contributing factors, reflect management concern, and reduce the chance of recurrence.

Investigation Tips

The investigator should:

- Avoid placing blame or implying blame on any person involved in the incident.
- Prepare documentation such as photos and diagrams as appropriate.
- Be objective, interview witnesses and get the facts.
- Reconstruct the event without any bias.
- Use open-ended questions when interviewing witnesses.

Questions to Ask

When investigating accidents, asking open-ended questions beginning with “who,” “what,” “when,” “where,” “why,” and “how” will provide more information than closed-ended questions.

Examples include:

- How did it happen?

- Why did it happen?
- How could it have been prevented?
- Who was involved?
- Who witnessed the incident?
- Where were the witnesses at the time of the incident?
- What was the injured worker doing?
- What was the employee working on?
- When did it happen?
- When was the accident reported?
- Where did it happen?
- Why was the employee assigned to do the job?

The single, most important question that must be answered as the result of any investigation is: "What do you recommend be done (or have you done) to prevent this type of incident from recurring?"

Once the Accident Investigation is Complete

1. The investigator will document the investigation and recommend corrective action.
2. Leadership and Human Resources will review the results of all investigations, prepare communication to staff, take corrective actions, and consider safety program modifications.
3. Information obtained through accident investigations may be used to update and improve the safety plan.

COVID-19 Prevention Plan

Pathways Academy Adult Education ("PAAE") is committed to providing a safe and healthy learning and working environment. While COVID-19 states of emergency have ended at both the federal and state levels, PAAE maintains a COVDI-19 prevention approach consistent with current Cal/OSHA "Non-Emergency" COVID-19 Prevention Regulations and public health guidance. Given that most employees work remotely, COVID-19 prevention measures primarily apply to in-person meetings, school events, or other PAAE-sponsored gatherings.

Communication

PAAE will do all of the following in a form readily understandable by employees:

- In the event of any confirmed COVID-19 case at a PAAE-controlled worksite or event, PAAE will provide prompt notice to individuals who may have had close contact, while maintaining confidentiality.
- PAAE will follow any local public health recommendations regarding possible outbreaks or clusters

Self-Monitoring and Symptom Screening

- Employees should self-assess for COVID-19 symptoms (e.g., fever, cough, difficulty breathing, fatigue, body aches, etc.) and stay home if symptomatic.
- Individuals experiencing symptoms or testing positive for COVID-19 must stay home and consult with Human Resources (HR) to determine if on-site or remote work is appropriate.

Face Coverings

- In general, face coverings are not universally required under current state regulations.
- PAAE strongly encourages masking indoors during periods of elevated community transmission or if recommended by local health officials.
- Face coverings will be provided upon request at no cost to employees.
- Masks may still be required in certain high-risk circumstances or if mandated by local health orders.

Hand Hygiene and Respiratory Etiquette

- All staff and students are encouraged to frequently wash hand**s** with soap and water for at least 20 seconds.
- Hand sanitizer is provided in office settings and at school events when handwashing is not feasible.
- Cover coughs and sneezes with a tissue or use the inside of the elbow, then wash or sanitize hands.

Ventilation and Cleaning

- When applicable for PAAE-controlled worksites or in-person events, PAAE will take reasonable steps to support ventilation and cleaning consistent with public health guidance.

- **Exposure or Positive Case Protocol**

Positive COVID-19 Test

  - Employees who test positive for COVID-19 should remain off-site and may return consistent with current public health guidance and HR direction.
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Exposure to a Confirmed Case

  - Employees who are notified of potential exposure should monitor for symptoms and follow current public health guidance. Employees who develop symptoms should notify HR and remain off-site.

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Correction Of Covid-19 Hazards

PAAE has implemented policies and/or procedures for correcting unsafe or unhealthy conditions, work practices, policies and procedures in a timely manner based on the severity of the hazard.

These include, but are not limited to, implementing controls and/or policies and procedures in response to the evaluations conducted, and implementing the controls outlined in the Evaluation section of this policy.

PAAE will implement procedures to reduce the transmission of COVID-19 based on the investigation and in compliance with local and state guidelines.

Training And Instruction

Notification shall be provided to parents of minor students advising them of health and safety requirements for students to return to in-person activities. Staff shall receive training and information on COVID-19 and preventative practices.

PAAE will provide effective training and instruction to employees that includes information regarding applicable COVID-19 related benefits and leave options under the law and PAAE policy. Online COVID-19 training that includes the following information:

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An infectious person may have no symptoms.

- The importance of frequent hand washing with soap and water for at least 20 seconds.
- The importance of using hand sanitizer as a disinfectant when employees do not have immediate access to a sink or hand washing facility.
- A list of COVID-19 symptoms, and the importance of not coming to work and obtaining a COVID-19 test if the employee has such symptoms.

Reporting, Recordkeeping, And Access

- PAAE will comply with public health reporting requirements when legally required or directed by local health authorities.

- **Pay, Benefits, and Leave**

  - Exclusion Pay: Under the current Non-Emergency Regulations, there is no general requirement for exclusion pay for COVID-19 unless an employer policy or labor agreement states otherwise, subject to change by law.

- Employees who cannot work due to COVID-19 illness or isolation may use any available paid sick leave or other applicable leave benefits (e.g., vacation, personal time).
- If you believe you were exposed at work, notify HR for an evaluation of workers' compensation or other benefits eligibility.

- **Training and Communication**

PAAE will provide periodic training regarding COVID-19 best practices, including updates to CDC or state/local requirements, recommended mask use, and disinfection procedures.

Any changes in guidelines will be relayed to employees promptly via email, staff meetings, or updates to the IIPP. We encourage employees to ask questions and report concerns about COVID-19 or other safety issues without fear of reprisal.

This policy remains in effect until further notice and may be updated based on new CDC, Cal/OSHA, or local health department guidelines.

All employees are expected to comply with the updated COVID-19 Prevention and Response Policy as part of PAAE's overall Injury and Illness Prevention Plan (IIPP).

It is the policy of the Board of Directors of PAAE that all teachers and staff shall be responsible for ensuring adherence to the policies of PAAE for the safe operation consistent with all applicable laws, regulations, and policies.

Enforcement of Safety Policies

Employee compliance with PAAE's IIPP is mandatory and shall be considered a condition of employment.

Training Programs

Both new and continuing School staff will be trained on safe work practices per board policy. This will help ensure that all employees understand and abide by PAAE's safety policies.

Retraining

Employees that are observed performing unsafe acts or not following proper procedures or rules will be retrained. The supervisor may formally document safety concerns and the corrective action taken with the employee and include in the employee's personnel file.

INJURY AND ILLNESS PREVENTION PLAN

Disciplinary Action

Failure to adhere to safety policies and procedures established by PAAE can have a serious impact on everyone concerned. An unsafe act can threaten not only the health and wellbeing of the employee committing the unsafe act, but can also affect the safety of their coworkers and customers. Accordingly, any employee who violates any of PAAE's safety policies will be subject to disciplinary action.

Failure to promptly report any on-the-job accident or injury, on the same day as it occurs, is considered a serious violation of PAAE's safety policies. Any employee who fails to immediately report a work-related accident or injury, no matter how minor, shall be subject to disciplinary action.

Employees may be disciplined for infractions of safety rules and unsafe work practices, not just those that result in an injury, if it is determined after an investigation that the employee did not act in compliance with PAAE's safety procedures. Disciplinary action will only be taken for safety violations. An employee will not be disciplined or retaliated against for filing a claim for Workers' Compensation.

Violations of safety rules and the Code of Safe Practices are to be considered equal to violations of other School policies. Discipline will be administered in a manner that is consistent with PAAE's Employee Handbook.

APPENDIX A

ACKNOWLEDGMENT OF RECEIPT OF INJURY AND ILLNESS PREVENTION PLAN

The IIPP is included in the annual notice to employees and is provided to all new hires as part of the onboarding process.

PLEASE READ THE EMPLOYEE INJURY AND ILLNESS PREVENTION PLAN THEN SIGN THE ACKNOWLEDGMENT DOCUMENT.

This is to certify that I have received a copy of the Pathways Academy Adult Education ("School") Illness and Injury Prevention Plan. I have read this document, understand it, and will comply with it while working for PAAE.

I understand that failure to abide by these rules may result in disciplinary action and possible termination of my employment with PAAE.

I also understand that I am to report any injury to my supervisor immediately and report all safety hazards.

I further understand that I have the following rights:

- I am not required to work in any area I feel is not safe.
- I am entitled to information on any hazardous material/chemical I am exposed to while working.
- I am entitled to see a copy of the Injury and Illness Prevention Plan.
- I will not be discriminated against for reporting safety concerns.

Employee Name: _____

Employee's Signature: _____ Date: _____

APPENDIX B

Hepatitis B Vaccination Declination Form

EMPLOYEE NAME: _____

By signing below, I acknowledge the following:

I understand that due to my occupational exposure to blood or other potentially infectious materials I may be at risk of acquiring Hepatitis B Virus ("HBV") infection. I have been given the opportunity to be vaccinated with Hepatitis B vaccine, at no charge to myself. However, I decline the Hepatitis B vaccination at this time. I understand that by declining this vaccine, I continue to be at risk of acquiring Hepatitis B, a serious disease. If in the future, I continue to have occupational exposure to blood or other potentially infectious materials and I want to be vaccinated with Hepatitis B vaccine, I can receive the vaccination series at no charge to me.

SIGNATURE: _____ DATE: _____

APPENDIX C

CODE OF SAFE PRACTICES GENERAL

It is PAAE's policy that everything possible will be done to protect employees, students and visitors from accidents. Safety is a cooperative undertaking requiring participation by every employee. Failure by any employee to comply with safety rules will be grounds for discipline. Supervisors shall insist that employees observe all applicable School, State, and Federal safety rules and practices and take action as is necessary to obtain compliance.

To carry out this policy, employees SHALL:

1. Report unsafe conditions/equipment to supervisor or human resources.

2. Report accidents, injuries and illnesses to your supervisor or human resources.

3. Not be on the job under the influence of intoxicating liquor or drugs.

4. Refrain from horseplay and other acts that have an adverse influence on the safety or well being of other employees.

5. Not block means of egress in or out of PAAE or lock doors during working hours that would prevent individuals from being able to safely enter or exit PAAE in an emergency.

6. In the event of fire, sound the nearest alarm and evacuate the building.

7. Upon hearing the alarm bell, immediately evacuate the building and gather at the designated location. Remain there until the " ALL CLEAR " signal is given.

8. Cooperate with emergency personnel who respond to a fire or other emergency.

9. Not store any items in exit aisles, corridors, stairs, doorways and shall not block emergency equipment of any type.

10. Maintain all work areas in a safe, clean, neat and orderly manner.

11. Clean up all spills promptly.

12. Always utilize proper lifting techniques. Never attempt to lift or push an object that is too heavy and contact their supervisor when help is necessary.

INJURY AND ILLNESS PREVENTION PLAN

13. Never stack material on top of high places or store any material in an unstable manner.

14. Report frayed electrical cords or exposed wiring to their supervisor immediately.

15. Never use a metal ladder when working on or near electrical components and systems.

16. Plug in electrical equipment into appropriate wall receptacles or approved extension cord sized for capacity. Three pronged plugs shall be used to ensure continuity of ground.

17. Install all electrical cords so as not to block or hinder traffic areas and shall install appropriate rubber protectors to prevent electrical shock, trip hazards and allow wheelchair access.

18. Always keep flammable or toxic chemicals in closed containers when not in use. Store in approved flammable storage cabinets.

19. Appropriately label and store poisonous solutions not intended for consumption

General – Code of Safe Practices Acknowledgement

I have read and fully understand my responsibility to strongly adhere to all safety practices outlined in the "Code of Safe Practices." I understand that at any time I violate any of these safe practices, disciplinary action may follow. I have received a copy and have fully discussed this outline with my immediate Supervisor.

Employee _____ _____ _____

Signature Printed Name Date

Supervisor _____ _____ _____

Signature Printed Name Date