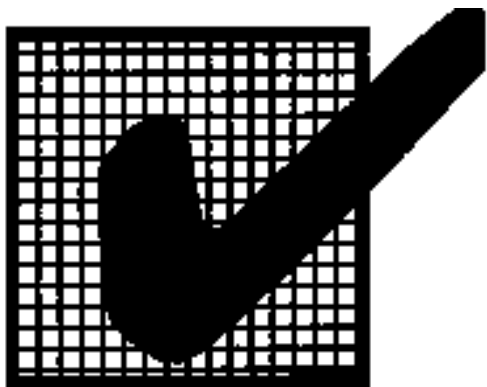

Guide to Developing

Your Workplace Injury & Illness Prevention Program



with checklists for
self-inspection



CS-1 revised April 1998 Call/OSHA Consultation Service
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Gray Davis, Governor

Department of Industrial Relations

This publication is not meant to be either a substitute for - or a legal interpretation of - the occupational safety and health standards. The reader is cautioned to refer directly to Title 8 of the California Code of Regulations for detailed and exact information, specifications, and exceptions.

About This Guide

In California every employer has a legal obligation to provide and maintain a safe and healthful workplace for the employees, according to the California Occupational Safety and Health Act of 1973. As of 1991, a written, effective Injury and Illness Prevention (IIP), Program is required for every California employer.

This manual describes the employers' responsibilities in establishing, implementing, maintaining, an IIP Program. It also outlines steps that can be taken to develop an effective Program that helps assure the safety and health of employees while on the job.

The term "employer" as used in the Cal/OSHA Act includes any person or corporation, the State and every State agency, every county or city or district and public agency therein, which has any person engaged in or permitted to work for hire, except for household services.

This manual is designed to help employers provide better workplace protection for their employees, and to reduce losses resulting from accidents and injuries. The material in this publication is based on principles and techniques developed by occupational safety and health professionals nationwide. It is intended to provide guidance, rather than prescribe requirements, and is not intended as a legal interpretation of any state standard every county or city or district and public agency therein, which has any person engaged in or permitted to work for hire, except for household services.

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Why Have a Workplace Injury and Illness Prevention Program?

Taking risks is a part of running a business, particularly for small business owners. You take risks in product development, marketing, and advertising in order to stay competitive. Some risks are just not worth the gamble. One of these is risking the safety and health of those who work for you.

Accidents Cost Money

Safety organizations, states, small business owners and major corporations alike now realize that the actual cost of a lost workday injury is substantial. For every dollar you spend on the direct costs of a worker's injury or illness, you will spend much more to cover the indirect and hidden costs. Consider what one lost workday injury would cost you in terms of:

- Productive time lost by an injured employee;
- Productive time lost by employees and supervisors attending the accident victim;
- Clean up and start up of operations interrupted by the accident;
- Time to hire or to retrain other individuals to replace the injured worker until his/her return;
- Time and cost for repair or replacement of any damaged equipment or materials;
- Cost of continuing all or part of the employee's wages, in addition to compensation;
- Reduced morale among your employees, and perhaps lower efficiency;
- Increased workers' compensation insurance rates; and
- Cost of completing paperwork generated by the incident.

Controlling Losses

If you would like to reduce the costs and risks associated with workplace injuries and illnesses, you need to address safety and health right along with production.

Setting up an Injury and Illness Prevention Program helps you do this. In developing the program, you identify what has to be done to promote the safety and health of your employees and worksite, and you outline policies and procedures to achieve your safety and health goals.

Cal/OSHA Injury & Illness Prevention Program

In California every employer is required by law (Labor Code Section) to provide a safe and healthful workplace for his/her employees. Title 8 (T8), of the *California Code of Regulations* (CCR), requires every California employer to have an effective Injury and Illness Prevention Program in writing that must be in accord with T8 CCR Section 3203 of the General Industry Safety Orders. Additional requirements in the following T8 CCR Safety Order Sections address specific industries:

Construction--Section 1509;
Petroleum--Sections 6507,6508,
6509, 6760, 6761, 6762;
Ship Building, Ship Repairing, Ship
Breaking--Section 8350; and
Tunnels--Section 8406.

For your convenience Section 3203 (General Industry) and Section 1509 (Construction) are reproduced here.

Title 8, Section 3203 *Injury and Illness Prevention Program*

(a) Effective July 1, 1991, every employer shall establish, implement and maintain an effective Injury and Illness Prevention Program. The Program shall be in writing and shall, at a minimum;

(1) Identify the person or persons with authority and responsibility for implementing the Program.

(2) Include a system for ensuring that employees comply with safe and healthy work practices. Substantial compliance with this provision includes recognition of employees who follow safe and healthful work practices, training and retraining programs, disciplinary actions, or any other such means that ensures employee compliance with safe and healthful work practices.

(3) Include a system for communicating with employees in a form readily understandable by all affected employees on matters relating to occupational safety and health, including provisions designed to encourage employees to inform the employer of hazards at the worksite without fear of reprisal. Substantial compliance with this provision includes meetings, training programs, posting, written communications, a system of anonymous notification by employees about hazards, labor/management safety and health committees, or any other means that ensures communication with employees.

Exception: Employers having fewer than 10 employees shall be permitted to communicate to and instruct employees orally in general safe work practices with specific instructions with respect to

hazards unique to the employees' job assignments, in compliance with Subsection (a)(3).

(4) Include procedures for identifying and evaluating workplace hazards including scheduling periodic inspections to identify unsafe conditions and work practices. Inspections shall be made to identify and evaluate hazards:

(A) When the Program is first established.

Exception: Those employers having in place on July 1, 1991, a written Injury and Illness Prevention Program complying with previously existing Section 3203.

(B) Whenever new substances, processes, procedures, or equipment are introduced to the workplace that represent a new occupational safety and health hazard; and

(C) Whenever the employer is made aware of a new or previously unrecognized hazard.

(5) Include a procedure to investigate occupational injury or occupational illness.

(6) Include methods and/or procedures for correction of unsafe or unhealthy conditions, work practices and work procedures in a timely manner based on the severity of the hazard:

(A) When observed or discovered; and

(B) When an imminent hazard exists which cannot be immediately abated without endangering employee(s) and/or property, remove all exposed personnel from the area except those necessary to correct the existing condition. Employees necessary to correct

the hazardous condition shall be provided the necessary safeguards.

(7) Provide training and instruction:

A) When the program is first established:

Exception: Employers having in place on July 1, 1991, a written Injury and Illness Prevention Program complying with the previously existing Accident Prevention Program in Section 3203.

B) To all new employees;

C) To all employees given new job assignments for which training has not previously been received;

D) Whenever new substances, processes, procedures or equipment are introduced to the workplace and represent a new hazard;

E) Whenever the employer is made aware of a new or previously unrecognized hazard; and

F) For supervisors to familiarize them with the safety and health hazards to which employees under their immediate direction and control may be exposed.

(b) Records of the steps taken to implement and maintain the Program shall include:

1) Records of scheduled and periodic inspections required by Subsection (a)(4) to identify unsafe conditions and work practices, including person(s) conducting the inspection, the unsafe conditions and work practices that have been identified and action taken to correct the identified unsafe conditions and work practices. These records shall be maintained for one (1) year; and

Exception: Employers with fewer than 10 employees may elect to maintain the inspection records only until the hazard is corrected.

(2) Documentation of safety and health training required by subsection (a)(7) for each

employee, including employee name or other

identifier, training dates, type(s) of training, and training providers. This documentation shall be maintained for one (1) year.

Exception No. 1: Employers with fewer than 10 employees can substantially comply with the documentation provision by maintaining a log of instructions provided to the employee with respect to the hazards unique to the employees' job assignment when first hired or assigned new duties.

Exception No. 2: Training records of employees who have worked for less than one (1) year for the employer need not be retained beyond the term of employment if they are provided to the employee upon termination of employment.

Exception No. 3: California Labor Code §6401.7 states that for employers with fewer than 20 employees who are in industries that are not on a designated list of high-hazard industries established by the Department of Industrial Relations (Department) and who have a Workers' Compensation Experience Modification Rate of 1.1 or less. Employers with fewer than 20 employees who are in industries on a designated list of low-hazard industries established by the Department, written documentation of the Program may be limited to the following requirements:

- A. Written documentation of the identity of the person or persons with authority and responsibility for implementing the program as required by Subsection (a)(1).
- B. Written documentation of scheduled periodic inspections to identify unsafe conditions and work practices as required by Subsection (a)(4).
- C. Written documentation of training and instruction as required by Subsection (a)(7).

Exception No. 4: California Labor Code §6401.7 states that Local governmental entities (any county, city, city and county, or district, or any public or quasi-public corporation or public agency therein, including any public entity, other than a state agency, that is a member of, or created by, a joint powers agreement) are not required to keep records concerning the steps taken to implement and maintain the Program.

Note 1: Employers determined by the Division to have historically utilized seasonal or intermittent employees shall be deemed in compliance with respect to the requirements for a written program if the employer adopts the Model Program prepared by the Division and complies with the requirements set forth therein.

Note 2: Employers in the construction industry who are required to be licensed under Chapter 9 (commencing with Section 7000) of Division 3 or the Business and Professions Code may use

records relating to employee training provided to the employer in connection with an occupational safety and health training program approved by the Division,

and shall only be required to keep records of those steps taken to implement and maintain the program with respect to hazards specific to the employee's job duties.

- c) Employers who elect to use a labor/management safety and health committee to comply with the communication requirements of Sub-section (a)(3) of this section shall be presumed to be in substantial compliance with Subsection (a)(3) if the committee:

- (1) Meets regularly, but not less than quarterly;
- (2) Prepares and makes available to the affected employees, written records of the safety and health issues discussed at committee meetings, and maintained for review by the Division upon request. The committee meeting records shall be maintained for one (1) year;
- (3) Reviews results of the periodic, scheduled worksite inspections;
- (4) Reviews investigations of occupational accidents and causes of incidents resulting in occupational injury, occupational illness, or exposure to hazardous substances and, where appropriate, submits suggestions to management for the prevention of future incidents;

Title 8, Section 1509.
***Construction Injury and Illness
Prevention Program.***

- (5) Review investigations of alleged hazardous conditions brought to the attention of any committee member. When determined necessary by the committee, the committee may conduct its own inspection and investigation to assist in remedial solutions;
 - (6) Submits recommendations to assist in the evaluation of employee safety suggestions; and
 - (7) Upon request from the Division verifies abatement action taken by the employer to abate citations issued by the Division.
- (a) Every employer shall establish, implement and maintain an effective Injury and Illness Prevention Program in accordance with Section 3203 of the General Industry Safety Orders.
 - (b) Every employer shall adopt a written Code of Safety Practices which relates to the employer's operations. The Code shall contain language equivalent to the relevant parts of Plate A-3 of the Appendix contained within the Cal/OSHA Construction Safety Orders. (Note: General items are listed in Appendix C of this guide.)
 - (c) The Code of Safe Practices shall be posted at a conspicuous location at each job site office or be provided to each supervisory employee who shall have it readily available.
 - (d) Periodic meetings of supervisory employees shall be held under the direction of management for the discussion of safety problems and accidents that have occurred.
 - (e) Supervisory employees shall conduct "toolbox" or "tailgate" safety meetings, or equivalent, with their crews at least every 10 working days to emphasize safety.

What is an Injury & Illness Prevention Program?

Your Injury and Illness Prevention Program must be a written plan that includes procedures and is put into practice. These elements are required:

- Management commitment/assignment of responsibilities;
- Safety communications system with employees;
- System for assuring employee compliance with safe work practices;
- Scheduled inspections/evaluation system;
- Accident investigation;
- Procedures for correcting unsafe/unhealthy conditions;
- Safety and health training and instruction; and
- Recordkeeping and documentation.

Management Commitment/Assignment of Responsibilities

Your commitment to safety and health shows in every decision you make and every action you take. Your employees will respond to that commitment.

The person or persons with the authority and responsibility for your safety and health program must be identified and given management's full support. You can demonstrate your commitment through your personal concern for employee safety and health and by the priority you place on these issues.

If you want maximum production and quality, you need to control potential workplace hazards and correct hazardous conditions or practices as they occur or are recognized.

You must commit yourself and your company by building an effective Injury and Illness Prevention Program and integrating it into your entire operation.

This commitment must be backed by strong organizational policies, procedures, incentives, and disciplinary actions as necessary to ensure employee compliance with safe and healthful work practices. They should include:

1. Establishment of workplace objectives for accident and illness prevention, like those

you establish for other business functions such as sales or production for example: "Ten percent fewer injuries next year," "Reduce down-time due to poorly maintained equipment."

2. Emphasis on your staff's safety and health responsibilities and recognition by your supervisors and employees that they are accountable. Advise your management staff that they will be held accountable for the safety record of the employees working under them, and then back it up with firm action.
3. A means for encouraging employees to report unsafe conditions with assurance that management will take action.
4. Allocation of company resources financial, material and personnel for:
 - Identifying and controlling hazards in new and existing operations and processes, and potential hazards.
 - Installing engineering controls.
 - Purchasing personal protective equipment.
 - Promoting and training employees in safety and health.
5. Setting a good example! If, for instance, you require hard hats to be worn in a specific area, then you and other management wear a hard hat in that area.

If you and your management team do not support and participate in the program, you are doomed to failure from the start. It is especially important for

plant supervisors and field superintendents to set a good example.

Safety Communications

Your program must include a system for communicating with employees — in a form readily understandable by all affected employees — on matters relating to occupational safety and health, including provisions designed to encourage employees to inform the employer of hazards at the worksite without fear of reprisal.

While this section does not require employers to establish labor-management safety and health committees, it is an option you should consider. If you choose to do so, remember that employers who elect to use a labor-management safety and health committees, it is an option you should consider. If you choose to do so, remember that employers who elect to use a labor-management safety and health committee to comply with the communication requirements are presumed to be in substantial compliance if the committee:

1. Meets regularly but not less than quarterly.
2. Prepares and makes available to affected employees written records of the safety and health issues discussed at the committee meetings, and maintained for review by the Division upon request.
3. Review results of the periodic scheduled worksite inspections.
4. Reviews investigations of occupational accidents and causes of incidents resulting in occupational injury, occupational illness or exposure to hazardous substances, and where appropriate, submits suggestions to management for the prevention of future incidents.
5. Reviews investigations of alleged hazardous conditions brought to the attention of any committee member.

When determined necessary by the committee, it may conduct its own inspection and investigation to assist in remedial solutions.

6. Submits recommendations to assist in the evaluation of employee safety suggestions.
7. Upon request of the Division, verifies abatement action taken by the employer to abate citations issued by the Division.

If your employees are not represented by an agreement with an organized labor union, and part of your employee population is unionized, the establishment of labor-management committees is considerably more complicated. You should request clarification from the Cal/OSHA Consultation Service.

If you elect not to use labor-management safety and health committees, be prepared to formalize and document your required system for communicating with employees.

Here are some helpful tips on complying with this difficult section:

1. Your communication system must be in a form "readily understandable by all affected employees." This means you should be prepared to communicate with employees in a language they can understand, and if an employee cannot read in any language, you must communicate with him/her orally in a language "readily understandable." Your communication system must be "designed to encourage employees to inform the employer of hazards at the workplace without fear of reprisal" it

must be a two-way system of communication.

2. Schedule general employee meetings at which safety is freely and openly discussed by those present. Such meetings should be regular, scheduled, and announced to all employees so that maximum employee attendance can be achieved. Remember to do this for all shifts. Many employers find it cost effective to hold such meetings at shift change time, with a brief overlap of schedules to accomplish the meetings. If properly planned, effective safety meetings can be held in a 15 to 20 minute time frame. Concentrate on:

- Occupational accident and injury history at your own worksite, with possible comparisons to other locations in your company.
- Feedback from the employee group.
- Guest speakers from your worker's compensation insurance carrier or other agencies concerned with safety.
- Brief audio-visual materials that relate to your industry.
- Control of the meetings.

Stress that the purpose of the meeting is safety. Members of management should attend this meeting.

3. Training programs are excellent vehicles for communicating with employees.
4. Posters and bulletins can be very effective ways of communicating with employees. Useful materials can be obtained from Cal/OSHA, your workers' compensation insurance carrier, the National Safety Council or other commercial and public service agencies.
5. Newsletters or similar publications devoted to safety are also very effective communication devices. If you cannot devote resources to an entire publication, make safety a featured item in every issue of your company newsletter.

6. A safety suggestion box can be used by employees, anonymously if desired, to communicate their concerns to management.
7. Publish a brief company safety policy or statement informing all employees that safety is a priority issue with management, and urge employees to actively participate in the program for the common good of all concerned. (Model policy, statements are found in Appendix A.)
8. Communicate your concerns about safety to all levels of management.
9. Document all communication efforts, as you will be required to demonstrate that a system of effective communication is in place.

Hazard Assessment & Control

Periodic inspections and procedures for correction and control provide a method of identifying existing or potential hazards in the workplace, and eliminating or controlling them. Hazard control is the heart of an effective Injury and Illness Prevention Program.

If hazards occur or recur, this reflects a breakdown in the hazard control system. The hazard control system is also the basis for developing safe work procedures and injury/illness prevention training.

The required hazard assessment survey of your establishment, when first developing your Injury and Illness Prevention Program, must be made by a qualified person. This survey can provide

the basis and guide for establishing your hazard assessment and control system. The survey produces knowledge of hazards that exist in the workplace, and conditions, equipment and procedures that could be potentially hazardous.

An effective hazard control system will identify: hazards that exist or develop in your workplace, how to correct those hazards, and steps you can take to prevent their recurrence. If you have an effective system for monitoring workplace conditions:

1. You will be able to prevent many hazards from occurring through scheduled and documented self-inspections.

Make sure established safe work practices are being followed and those unsafe conditions or procedures are identified and corrected properly. Scheduled inspections are in addition to the everyday safety and health checks that are part of the routine duties of managers and supervisors.

The frequency of these inspections depends on the operations involved, the magnitude of the hazards, the proficiency of employees, changes in equipment or work processes, and the history of workplace injuries and illnesses. Inspections should be conducted by personnel who, through experience or training, are able to identify actual and potential hazards and understand safe work practices.

Written inspection reports must be reviewed by management and/or the safety committee. The review should assist in prioritizing actions and verify completion of previous corrective actions. Overall inspection program results should be reviewed for trends.

Know which Cal/OSHA safety orders contained in Title 8 of the *California Code of Regulations* apply to your workplace and use them to identify potential hazards. A Cal/OSHA Consultation Service consultant or outside consultant can assist you in identifying safety orders applicable to your work.

2. Your employees should be encouraged to tell you or their supervisors of possibly

hazardous situations, knowing their reports will be given prompt and serious attention without fear of reprisal.

When you let them know that the situation was corrected (or why it was not hazardous), you create a system by which your employees continue to report hazards promptly and effectively.

3. Workplace equipment and personal, protective equipment should be maintained in safe and good working condition.

In addition to what is required by Cal/OSHA standards, your own program monitors the operation of workplace equipment, and can also verify that routine preventive maintenance is conducted and personal protective equipment is reliable. This makes good safety sense, and proper maintenance can prevent costly breakdowns and undue exposures.

4. Hazards should be corrected as soon as they are identified.

For any that can't be immediately corrected, set a target date for correction based on such considerations as the probability and severity of an injury or illness resulting from the hazard; the availability of needed equipment, materials and/or personnel; time for delivery, installation, modification or construction; and training periods.

Provide interim protection to employees who need it while correction of hazards is proceeding. A written tracking system such as a log helps you monitor the progress of hazard correction.

5. You should review and prioritize your program based on the severity of the hazard.

Accident Investigation

A primary tool you should be using in an effort to identify and recognize the areas responsible for accidents is a thorough and properly completed accident investigation. It should be in writing and adequately identify the cause(s) of the accident or near-miss occurrence.

Accident investigations should be conducted by trained individuals, and with the primary focus of understanding why the accident or near miss occurred and what actions can be taken to preclude recurrence.

In large organizations this responsibility may be assigned to the safety director. In smaller organizations the responsibility may lie directly with the supervisor responsible for the affected area or employee. Questions to ask in an accident investigation include:

1. What happened?

The investigation should describe what took place that prompted the investigation: an injury to an employee, an incident that caused a production delay, damaged material or any other conditions recognized as having a potential for losses or delays.

2. Why did the incident happen?

The investigation must obtain all the facts surrounding the occurrence: what caused the situation to occur; who was involved; was/were the employee(s) qualified to perform the functions involved in the accident or near miss; were they properly trained; were proper operating procedures established for the task involved; were procedures followed, and if not, why not; where else this or a similar situation might exist, and how it can be corrected.

3. What should be done?

The person conducting the investigation must determine which aspects of the operation or processes require additional attention. It is important to note that the purpose here is not to establish blame, but to determine what type

of constructive action can eliminate the cause(s) of the accident or near miss.

4. What action has been taken?

Action already taken to reduce or eliminate the exposures being investigated should be noted, along with those remaining to be addressed. Any interim or temporary precautions should also be noted. Any pending corrective action and reason for delaying its implementation should be identified.

Corrective action should be identified in terms of not only how it will prevent a recurrence of the accident or near miss, but also how it will improve the overall operation. This will assist the investigation in selling his/her solutions to management. The solution should be a means of achieving not only accident control, but also total operation control.

If you have a safety and health committee, its members should review investigations of all accidents and near-miss incidents to assist in recommending appropriate corrective actions to prevent a similar recurrence.

Thorough investigation of all accidents and near misses will help you identify causes and needed corrections, and can help you determine why accidents occur, where they happen, and any accident trends. Such information is critical to preventing and controlling hazards and potential accidents.

Safety Planning, Rules & Work Procedures

Planning for safety and health is an important part of every business decision, including purchasing, engineering, changes in work processes, and planning for emergencies. Your safety and health planning are effective when your workplace has:

1. Rules written to apply to everyone and addressing areas such as personal protective equipment, appropriate clothing, expected behavior, and emergency procedures. You and your employees should periodically review and update all rules and procedures to make sure they reflect present conditions.

Rules and procedures should be written for new exposures when they are introduced into the workplace.

2. Safe and healthful work practices developed for each specific job.
3. Discipline or reward procedures to help assure that safety rules and work procedures are put into practice and enforced. Reward or positive reinforcement procedures such as bonus, incentive or employee recognition programs should provide positive motivation for compliance with safety rules and procedures.
4. A written plan for emergency situations. Your plan must include a list of emergencies that could arise and a set of procedures in response to each situation. Some emergency procedures, such as those covering medical emergencies or fire evacuation, are mandated by Cal/OSHA regulations.

If you have operations involving hazardous substances, procedures or processes, you must designate emergency response teams to be

specifically trained and equipped to handle possible imminent hazards.

Safety & Health Training

Training is one of the most important elements of any Injury and Illness Prevention Program. It allows employees to learn their job properly, brings new ideas into the workplace, reinforces existing ideas and practices, and puts your program into action.

Your employees benefit from safety and health training through fewer work-related injuries and illnesses, and reduced stress and worry caused by exposure to hazards.

You benefit from reduced workplace injuries and illnesses, increased productivity, lower costs, higher profits, and a more cohesive and dependable work force.

An effective Injury and Illness Prevention Program includes training for both supervisors and employees. Training for both is required by Cal/OSHA safety orders.

You may need outside professionals to help you develop and conduct your required training program. Help is available from the Cal/OSHA Consultation Service, your workers' compensation insurance carrier, private consultants and vendor representatives.

Outside trainers should be considered temporary. Eventually you will need your own in-house training capabilities so you can provide training that is timely and specific to the needs of your workplace and your employees.

To be effective and also meet Cal/OSHA requirements, your training program needs to:

1. Let your supervisors know:
 - They are key figures responsible for establishment and success of your Injury and Illness Prevention Program.
 - The importance of establishing and maintaining safe and healthful working conditions.
 - They are responsible for being familiar with safety and health hazards to which their employees are exposed, how to recognize them, the potential effects these hazards have on the employees, and rules,

procedures and work practices for controlling exposure to those hazards.

- How to convey this information to employees by setting good examples, instructing them, making sure they fully understand and follow safe procedures.
 - How to investigate accidents and take corrective and preventive action.
2. Let your employees know:
- The success of the company's Injury and Illness Prevention Program depends on their actions as well as yours.
 - The safe work procedures required for their jobs and how these procedures protect them against exposure.
 - When personal protective equipment is required or needed, how to use it and maintain it in good condition.
 - What to do if emergencies occur in the workplace.

An effective Injury and Illness Prevention Program requires proper job performance by everyone in the workplace. As the employer, you must ensure that all employees are knowledgeable about the materials and equipment they are working with, what known hazards are present and how they are controlled.

Each employee needs to understand that:

- No employee is expected to undertake a job until he/she has received instructions on how to do it properly and safely, and is authorized to perform the job.
- No employees should undertake a job that appears to be unsafe.
- No employee should use chemicals without fully understanding their toxic properties and without the knowledge required to work with them safely.
- Mechanical safeguards must always be in place and kept in place.
- Employees are to report to a superior or designated individual all unsafe conditions encountered during work.
- Any work-related injury or illness suffered, however slight, must be reported to management at once.
- Personal protective equipment must be used when aged where required, and properly maintained.

Your supervisors must recognize that they are the primary safety trainers in your organization. Encourage and help them by providing supervisory training. Many community colleges offer management training courses at little or no cost.

You as the employer are required under Cal/OSHA standards to establish and carry out a formal training program. A professional training person, an outside consultant or your supervisors may provide injury and illness prevention training to your employees.

This program must, at a minimum, provide training and instruction:

- To all employees when your program is first established.
- To all new employees.
- To all employees given new job assignments for which training has not been previously received.
- Whenever new substances, processes, procedures or equipment are introduced to the workplace and present a new hazard.
- Whenever you or your supervisors are made aware of a new or previously unrecognized hazard.
- For all supervisors to assure they are familiar with the safety and health hazards to which employees under their immediate direction and control may be exposed.

Getting Started on Your Injury & Illness Prevention Program

Put the elements (see page 7) of an Injury and Illness Prevention Program together, and come up with a plan to suit your individual workplace. Decide exactly what you want to accomplish, and determine what steps are necessary to achieve your goals.

Then plan out how and when each step will be carried out and who will do it and put this plan in writing. In developing the plan, consider your company's immediate needs and provide for ongoing worker protection.

If you have difficulty deciding where to begin, call the Cal/OSHA Consultation Service for assistance. A Consultation Service consultant can help you determine what is needed to make your Injury and Illness Prevention Program effective. The consultant will work with you on a plan for making these improvements, and assist you in establishing procedures for making sure your program remains effective.

The following sections describe the process you might go through in establishing an Injury and Illness Prevention Program. Remember that you do not have to do everything described in this manual at once.

Assign Responsibilities

Decide who in your company will be given responsibility and authority to manage this program. In many cases, it's the owner.

Sometimes the plant manager or a ranking member of the management team is the one to develop and set up the program. It could even be an engineer, personnel specialist or other staff member.

The person assigned must be identified by name in your program.

Your program's success hinges on the individual you choose, and he/she cannot succeed without your full cooperation and support. Remember, though, that even when you appoint someone as your safety manager and delegate authority to manage the program,

the ultimate responsibility for safety and health in your workplace still rests with you.

When considering responsibility, do not forget to include all of your employees. Give each employee training and responsibility to follow your safety and health procedures, and to recognize report hazards in his/her immediate work area.

All employees must be informed of their responsibility under Labor Code Section 6407.1, which requires every employee to comply with occupational safety and health standards applicable to their own actions and conduct.

Look at What You Have

Before you make any changes in your safety and health operations, gather as much information as possible about current conditions at your workplace, and work practices that are already part of your Injury and Illness Prevention Program. This information can help you identify workplace problems and determine what's involved in solving them.

Assessment of your workplace should be conducted by the person responsible for the Injury and Illness

Prevention Program, and/or a professional occupational safety and health consultant.

It consists of the following activities.

Safety & Health Survey

The first is a comprehensive safety and health survey of your facility to identify existing or potential safety and health hazards.

This survey should evaluate workplace conditions with respect to: safety and health regulations and generally recognized safe work practices and physical hazards; use of any hazardous materials; employee work habits; and a discussion of safety and health problems with employees. The survey must be documented if made for the purpose of establishing an Injury and Illness Prevention Program.

Your safety and health survey includes:

1. Equipment-Make a list of your equipment and tools, including the principle locations of their use. Special attention should be given to inspection schedules, maintenance activities and your facility's layout.
2. Chemicals-Make a list of all chemicals used in your workplace, obtain material safety data sheets on the materials used, and identify where they are used.
3. Work practices-Detail specific work practices associated with equipment, tools and chemical use. Special attention should be given to personal protective equipment, guarding, ventilation, emergency procedures and use of appropriate tools.
4. Cal/OSHA standards-Review standards applicable to your type of operation, equipment, processes, materials, and the like. These standards are minimum requirements for workplace safety and health. Most workplaces come under Title 8, *California Code of Regulations*, General Industry Safety Orders. If you are involved with construction, petroleum,

mining or tunneling, you will need the specific standards applicable to that industry as well.

Workplace Assessment

The next activity is an evaluation of your existing Injury and Illness Prevention Program to identify areas that may be working well and those that may need improvement.

Examine your company's:

1. Accident, injury or illness data.
2. Worker's compensation costs.
3. Rates of employee turnover or absenteeism.
4. Information on safety and health activities ongoing or previously tried.
5. Company policy statements.
6. Rules-both work and safety.
7. Guidelines for proper work practices and procedures.
8. Records of training programs.
9. Compliance with requirements of California's Right to Know Law and Hazards Communications Standard.
10. Employee capabilities-make an alphabetical list of all employees, showing the dates they were hired, what their jobs are, and their experience and training. Special attention should be given to new employees and employees with handicaps.
11. Joint labor-management safety and health committee activities.
12. Other safety-related programs.

Review & Compare

After all the facts are gathered, look at how the information on your workplace corresponds with the standards, and with the critical components of an Injury and Illness

Prevention Program: management commitment/assignment of responsibilities; safety communications system with employees; system for assuring employee compliance with safe work practices; scheduled inspections/evaluation system; accident investigation; procedures for correcting unsafe/unhealthy conditions; safety and health training and instruction; recordkeeping and documentation.

You may find that you are already well on your way toward having a good Injury and Illness Prevention Program. Compare what you have with Appendix B.

Develop an Action Plan

An action plan is a specific, written description of problems and solutions—it can and should be changed to correspond with changes in the workplace.

A good action plan has two parts. One is an overall list of major changes or improvements needed to make your Injury and Illness Prevention Program effective. Assign each item a priority and a target date for completion, and identify the person who will monitor or direct each action.

The second part of an action plan involves taking each major change or improvement listed and working out a specific plan for making that change. Write out what you want to accomplish, the steps required, who would be assigned to do what, and when you plan to be finished. This part of the action plan helps you keep track of program improvement so that details do not slip through the cracks.

Take Action

Put your plan into action, beginning with the item assigned highest priority. Make sure it is realistic and manageable, then address the steps you have written out for that item.

You can, of course, work on more than one item at a time. Priorities may change as other needs are identified or as your company's resources change.

Open communication with your employees is crucial to the success of your efforts. Their cooperation depends on understanding what the Injury and Illness Prevention Program is all about, why it is important to them, and how it affects their work. The more you do to keep them informed of the changes you are making, the smoother your transition will be.

By putting your action plan into operation at your workplace, you will have taken a major step toward having an effective Injury and Illness Prevention Program. Remember, an Injury and Illness Prevention Program is a *plan* put into *practice*.

Maintain Your Program

Schedule a review—quarterly, semiannually or annually—to look at each critical component in your Injury and Illness Prevention Program, to determine what is working well and what changes, if any, are needed. When you identify needs that should be addressed, you have the basis for new safety and health objectives for program improvement.

Safety & Health Recordkeeping

No operation can be successful without adequate recordkeeping, which enables you to learn from past experience and make corrections for future operations. Records of accidents, work-related injuries, illnesses and property losses serve as a valuable purpose.

Under Cal/OSHA recordkeeping requirements, information on accidents is gathered and stored. Upon review, causes can be identified and control procedures instituted to prevent the illness or injury from recurring. Keep in mind that any inspection of your workplace may require you to demonstrate the effectiveness of your program.

Injury & Illness Records

Injury and illness recordkeeping requirements under Cal/OSHA require a minimum amount of paperwork.

These records give you one measure for evaluating the success of your safety and health activities: success would generally mean a reduction or elimination of employee injuries or illnesses during a calendar year.

Five important steps are required by the Cal/OSHA recordkeeping system:

1. Obtain a report on every injury or illness requiring medical treatment.
2. Record each injury or illness on the *Cal/OSHA Log and Summary of Occupational Injuries and Illnesses*, Cal/OSHA Form 200, according to its instructions.
3. Prepare a supplementary record of the occupational injuries and illnesses on OSHA Form 101, or *Employees Report of*

Injury or Illness (Form 5020), with the same information.

4. Every year prepare the summary Cal/OSHA Form 200, post it no later than February 1 and keep it posted where employees can see it until March 1, or provide copies as required.
5. Maintain the last five years of these records in your files.

During the year, regularly review these records to see where your injuries and illnesses are occurring. Look for any patterns or repeat situations. These records can help you identify hazardous areas in your work-place and pinpoint where immediate corrective action is needed.

Since the basic Cal/OSHA records are for reportable injuries and illnesses only, you might expand your system to include all incidents relating to workplace safety and health, even those where no injury or illness resulted. Such information can assist you in pinpointing unsafe acts, conditions or procedures.

Exposure Records

Injury and illness records may not be the only records you need to maintain. Cal/OSHA standards concerning toxic substances and hazardous exposures require records of employee exposure to these substances and sources, physical examination reports, employment records, and other information.

Employers using any regulated carcinogens have additional reporting and recordkeeping requirements. See Title 8 of the *California Code of Regulations* for details.

Documentation of Your Activities

Essential records, including those legally required for workers' compensation, insurance audits, and government inspections, must be maintained for as long as required.

For most employers, Cal/OSHA standards also require that you keep records of steps taken to establish and maintain your Injury and Illness Prevention Program. They must include:

1. Records of scheduled and periodic inspections as required by the standard to identify unsafe conditions and work practices. The documentation must include the name of the person(s) conducting the inspection, the unsafe conditions and work practices identified, and the action taken to correct the unsafe conditions and work practices. The records are to be maintained for at least one year. However, employers with fewer than 10 employees may elect to maintain the inspection records only until the hazard is corrected.
2. Documentation of safety and health training required by standards for each employee. The documentation must specifically include employee name or other identifier, training dates, type(s) of training and the name of the training provider. These records must also be kept for at least one year, except that training records of employees who have worked for less than one year for the employer need not be retained beyond the term of employment if they are provided to the employee upon termination of employment.

Also, employers with fewer than 10 employees can substantially comply with the documentation provision by maintaining a log of instructions provided to the employee with respect to the hazards unique to the employees' job assignment when first hired or assigned new duties.

Some relief from documentation is available for employers with fewer than 20 employees who are working in industries that are on the Department of Industrial Relations

(DIR's) designated list of low-hazard industries, and for employers with fewer than 20 employees who are not on DIR's list of high-hazard industries and who have a Workers' Compensation Experience Modification Rate of 1.1 or less. For these industries, written documentation of the Injury and Illness Prevention Program may be limited to:

1. Written documentation of the identity of the person or persons with authority and responsibility for implementing the program;
2. Written documentation of scheduled periodic inspections to identify unsafe conditions and work practices; and
3. Written documentation of training and instruction.

Keeping such records fulfills your responsibilities under General Industry Safety Order 3203. It also affords an efficient means to review your current safety and health activities for better control of your operations, and to plan future improvements.

Model Programs

Three model Injury and Illness Prevention Programs are available from Cal/OSHA. They are:

CS 1A --- *Workplace Injury and Illness Prevention Model Program for High Hazard Employers*

CS 1B --- *Workplace Injury and Illness Prevention Model Program for Non-High Hazard Employers*

CS 1C --- *Workplace Injury and Illness Prevention Model Program for Employers with Intermittent Workers*

There are no requirements to use these model programs. However, any employer in an industry which has been determined by Cal/OSHA as being non-high hazard and who adopts, posts, and implements the *Workplace Injury and Illness Prevention Model Program for Non-High Hazard Employers* in good faith is not subject to assessment of a civil penalty for a first violation of T8 CCR 3203.

Any employer in an industry which has been determined by Cal/OSHA to historically utilize intermittent or seasonal employees and who adopts and implements the *Workplace Injury and Illness Prevention Model Program for Employers with Intermittent Workers* in good faith is deemed to be in compliance with the IIP Program requirements of T8 CCR 3203.

Proper use of these model programs, requires the IIP Program administrator to carefully review the requirements for each of the eight IIP Program elements, fill in the appropriate blank spaces and check those items that are applicable to your workplace. Sample forms for hazard assessment and correction, accident/exposure investigation, and worker training and instruction are provided with these model programs. Also provided are lists of training subjects and workplace checklists.

As always, these model programs must be maintained by the employer in order to be effective.

Contact the nearest Cal/OSHA Consultation Service office listed at the back of this publication to learn more about the model programs and obtain information on the different industry lists.

Sources of Information & Help

The Cal/OSHA Consultation Service can suggest sources both governmental and private for information, advice and training aids to help you develop and maintain your safety program. A surprising amount of assistance can be obtained at no cost to you, if you take time to inquire. In cases where money must be spent, it is usually money well spent.

Cal/OSHA Consultation Service

Employers who need help developing, improving or maintaining a safe and healthful place of employment can obtain free professional assistance from the Cal/OSHA Consultation Service on any of the issues or activities described in this manual. Cal/OSHA consultants help employers by:

- Identifying actual and potential safety or health hazards in the workplace and finding solutions to eliminate or control them.
- Identifying sources of help for employers in further technical assistance is needed.
- Providing a written report summarizing the finding of any consultation visit.
- Interpreting applicable safety and health standards.
- Helping establish or improve worksite Injury and Illness Prevention Programs.
- Helping develop and/or conduct safety and health training of both supervisory and non-supervisory personnel.

All services of the Cal/OSHA Consultation Service are entirely separate and distinct from the enforcement activities of the Division of Occupational Safety and Health (DOSH).

Consultants do not issue citations or assess penalties, and they do not inform DOSH of their work with an employer.

Any employer who has had a wall-wall survey performed by the Cal/OSHA Consultation Service, and has an effective Injury and Illness Prevention Program in operation, will greatly reduce the likelihood of citations or penalties if inspected by DOSH.

Employers with fixed worksites, and 250 or fewer employees at a specific worksite, can now become exempt from a DOSH discretionary compliance inspection by participating in a voluntary compliance program.

To obtain assistance or information from the Cal/OSHA Consultation Service contact any of its offices listed inside the back cover of this manual.

Other Sources

1. It is likely that businesses similar to yours have encountered similar problems. It is also possible that at least one of them has found a simple, efficient solution. Most managers are willing to share information in the area of workplace safety and health.
2. Most equipment manufacturers have also become quite concerned with safety in the use of their products. To help their customers and potential customers, and to minimize their liability in the event of adverse legal action, they are more than willing to furnish advice and engineering information to enhance safe operation of their equipment.
3. Many workers' compensation carriers, as well as liability and fire insurance companies, conduct periodic inspections and visits to evaluate safety and health hazards and give guidance and assistance in establishing and monitoring your program. Contact your carrier to see what it has to offer.

4. Many trade associations and employer groups emphasize safety and health matters to better serve their members. If you are not a member, find out if these groups are circulating their materials to nonmembers, as many do.
5. If your employees are organized, coordinate with their unions for taking joint action to solve problems and correct hazards. Many trade unions have safety and health expertise they are willing to share.
6. The National Council has a broad range of information services available. Call or visit your local chapter to obtain material pertaining to your business. If a local chapter is not nearby, you can write to:
 7. National Safety Council
 8. North Michigan Avenue
 9. Chicago, IL 60611
10. The Hazard Evaluation System and Information Services (HESIS) offers California employer and employees answers to questions about the health effects of chemical and physical agents in the workplace. You can contact HESIS at:
 11. HESIS
 12. Berkeley Way
 13. Berkeley, CA 94704
 14. Telephone (510) 540-3014
 15. Telephone (510) 5403014
16. The yellow pages of your telephone directory list many companies that specialize in items and services relating to safety and health and fire prevention. Most of them have extensive experience and knowledge in safety-related subjects, and are willing to furnish you with information and advice

Appendix A: Model Policy Statements

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

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

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

"The personal safety and health of each employee of this company is of primary importance. Prevention of occupationally-induced injuries and illnesses is of such consequence that it will be given precedence over operating productivity, whenever necessary. To the greatest degree possible, management will provide all mechanical and physical activities required for personal safety and health, in keeping with the highest standards."

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

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

"Our safety and health program will include:

- Providing mechanical and physical safeguards to the maximum extent possible.
- Conducting safety and health inspections to find, eliminate or control safety and health hazards as well as unsafe working conditions and practices, and to comply fully with the safety and health standards for every job.
- Training all employees in good safety and health practices.
- Providing necessary personal protective equipment, and instructions for use and care.
- Developing and enforcing safety and health rules, and requiring that employees cooperate with these rules as a condition of employment.
- Investigating, promptly and thoroughly, every accident to find out what caused it and correct the problem so it will not happen again.
- Setting up a system of recognition and awards for outstanding safety service or performance."

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

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

Appendix B: Non-Mandatory Checklist Evaluation Injury & Illness Prevention Programs

- ÿ Does the written Injury and Illness Prevention Program contain the elements required by Section 3203(a)?
- ÿ Are the person or persons with authority and responsibility for implementing the program identified?
- ÿ Is there a system for ensuring that employees comply with safe and healthy work practices (i.e., employee incentives, braining and retraining programs, and/or disciplinary measures)?
- ÿ Is there a system that provides communication with affected employees on occupational safety and health matter (i.e., meetings, training programs, posting, written communications, a system of anonymous notification concerning hazards and/or health and safety committees)?
- ÿ Does the communication system include provisions designed to encourage employees to inform the employer of hazards at the worksite without fear of reprisal?
- ÿ Is there a system for identifying and evaluating workplace hazards whenever new substances, processes, procedures, or equipment are introduced to the workplace and whenever the employer receives notification of a new or previously unrecognized hazard?
- ÿ Were workplace hazards identified when the program was first established?
- ÿ Are periodic inspections for safety and health hazards scheduled?
- ÿ Are records kept of inspections made to identify unsafe conditions and work practices, if required?
- ÿ Is there an accident and near-miss investigation procedure?
- ÿ Are unsafe or unhealthy conditions and work practices corrected expeditiously, with the most hazardous exposures given correction priority?
- ÿ Are employees protected from serious or imminent hazards until they are corrected?
- ÿ Have employees received training in general safe and healthy work practices?
- ÿ Do employees know the safety and health hazards specific to their job assignments?
- ÿ Is training provided for all employees when the training program is first established?
- ÿ Are training needs of employees evaluated whenever new substances, processes, procedures, or equipment are introduced to the workplace and whenever the employer receives notification of a new or previously unrecognized hazard?
- ÿ Are supervisors knowledgeable of the safety and health hazards to which employees under their immediate direction and control may be exposed?
- ÿ Are records kept documenting safety and health training for each employee by name or other identifier, training dates, type(s) of training and training providers?
- ÿ Does the employer have a labor-management safety and health committee?
- ÿ Does the committee meet at least quarterly?
- ÿ Is a written record of safety committee meetings distributed to affected employees and maintained for Division review?
- ÿ Does the committee review results of the periodic, scheduled worksite inspections?
- ÿ Does the committee review accident and near-miss investigations and, where necessary, submit suggestions for prevention of future incidents?
- ÿ When determined necessary by the committee does it conduct its own inspections and investigations, to assist in remedial solutions?
- ÿ Does the committee verify abatement action taken by the employer as specified in Division citations upon request of the Division?

Appendix C: Code of Safe Practices

(This is a suggested code. It is general in nature and intended as a basis for preparation by the contractor of a code that fits his operations more exactly.)

GENERAL

1. All persons shall follow these safe practice rules, render every possible aid to safe operations, and report all unsafe conditions or practices to the foreman or superintendent.

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