



# What is an Injury and Illness Prevention Program?

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Your injury and illness prevention program (IIPP) must be a written plan that includes procedures and is put into practice. The following elements should be part of your program:



1. Management commitment / assignment of responsibilities



2. Safety communications system with employees



3. System for assuring employee compliance with safe work practices



4. Scheduled inspections/evaluation system



5. Accident investigation



6. Procedures for correcting unsafe / unhealthy conditions



7. Safety and health training and instruction



8. Employee access to IIPP



9. Record keeping 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 identified. 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.

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.

### **POLICIES AND PROCEDURES 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," or "Reduce downtime 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 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 management will take action.**
4. **Allocation of company resources, including financial, material, and personnel for:**
  - ▶ Identifying and controlling existing or potential hazards in new and existing operations and processes.
  - ▶ Installing engineering controls.
  - ▶ Purchasing personal protective equipment.
  - ▶ Promoting and training employees in safety and health.
5. **Setting a good example! For example, if you require hard hats to be worn in a specific area, then you and other management wear a hard hat in that area.**

*Our survey of your operations to assist you in your loss control activities. No responsibility is assumed however, for the discovery and elimination of hazards which could possibly cause loss or damage at any facility that is inspected. Compliance with any submitted recommendations in no way guarantees the fulfillment of your obligations as may be required by any local, state, or federal laws.*



## Safety Communications

Your program must include a system for communicating in a readily understandable way with 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 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. These records are maintained for review by the Division upon request.
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.
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.*

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,” and 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 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.

### 3. 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 workers 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.

4. Training programs are excellent vehicles for communicating with employees.
5. 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.
6. 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.
7. A safety suggestion box can be used by employees, anonymously if desired, to communicate their concerns to management.
8. 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.)
9. Communicate your concerns about safety to all levels of management.
10. 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.

2. 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.
3. 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 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.

4. 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.
5. 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.
6. 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.



## Safety Planning, Rules, and 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 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 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, and 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 and how to use 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 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:

- ▶ 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 where required and must be 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.

As the employer, you 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.



## Employee Access to IIPP

Our employees—or their designated representatives—have the right to examine and receive a copy of our IIPP. This will be accomplished by:

1. Providing access in a reasonable time, place, and manner, but in no event later than five (5) business days after the request for access is received from an employee or designated representative.
  - a. Whenever an employee or designated representative requests a copy of the program, we will provide the requester a printed copy of the program, unless the employee or designated representative agrees to receive an electronic copy of the program.
  - b. One printed copy of the program will be provided free of charge. If the employee or designated representative requests additional copies of the program within one (1) year of the previous request and the program has not been updated with new information since the prior copy was provided, we may charge reasonable, non-discriminatory reproduction costs for the additional copies.
2. Providing unobstructed access through a company server or website, which allows an employee to review, print, and email the current version of the program.
  - a. Unobstructed access means the employee, as part of their regular work duties, predictably and routinely uses the electronic means to communicate with management or coworkers.

Describe how this will be accomplished using either of the two methods.

Also describe how we will communicate the right and procedure to access the program to all employees.

Any copy provided to an employee or their designated representative need not include any records of the steps taken to implement and maintain the written IIP program. Where we have distinctly different and separate operations with distinctly separate and different IIPPs, we may limit access to the IIPP applicable to the employee requesting it.

An employee must provide written authorization to make someone their “designated representative.” A recognized or certified collective bargaining agent will be treated automatically as a designated representative for the purpose of access to the company IIPP. The written authorization must include the following information:

- ▶ The name and signature of the employee authorizing the designated representative.
- ▶ The date of the request.
- ▶ The name of the designated representative.
- ▶ The date upon which the written authorization will expire (if less than 1 year).