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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 work-place 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.



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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 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.



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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:



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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 work-place 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. A Cal/OSHA Consultation Service consultant or outside consultant can assist you in identifying safety orders applicable to your work.
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 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.
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. Questions to ask in an accident investigation include:



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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:



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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.
5. 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.



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- 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 and 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.



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- 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.

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. Each employer (unless exempt by size or industry) must record each fatality, injury, or illness that is work-related, is a new case, or meets one or more of the general recording criteria specified in Title 8, Section 14300.
2. Record each injury or illness on the Cal/ OSHA Log of Occupational Work Related Injuries and Illnesses (Form 300) according to its instructions.
3. Prepare an Injury and Illness Incident Report (Form 301), or equivalent.
4. Annually review and certify the Cal/OSHA Form 300 and post the Summary of Work-Related Injuries and Illnesses (Form 300A) no later than February 1 and keep it posted where employees can see it until April 30.
5. Maintain the last five years of these records in your files.

NOTE: Additional information on recordkeeping can be found on the Internet at: www.californiaosha.info or www.dir.ca.gov/DOSH

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.



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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.