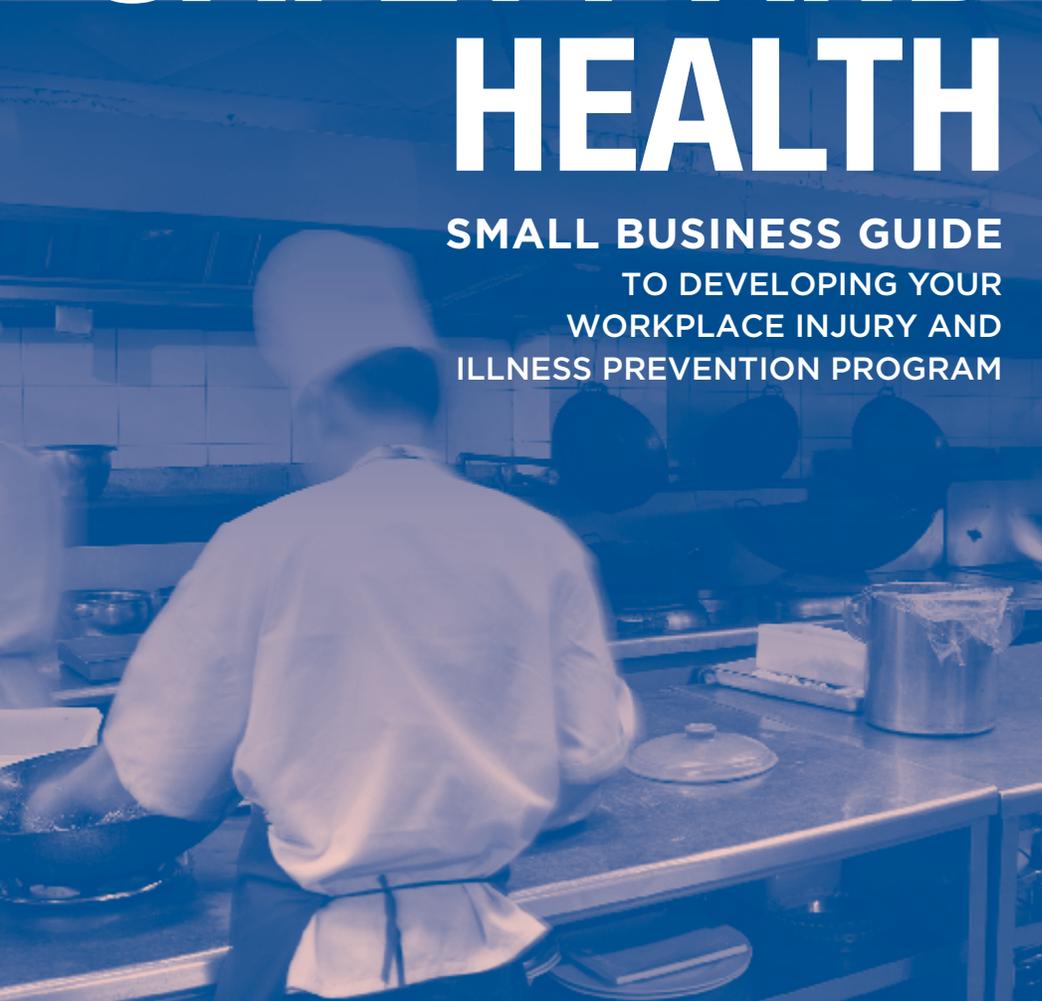


TAKING ACTION FOR SAFETY AND HEALTH

**SMALL BUSINESS GUIDE
TO DEVELOPING YOUR
WORKPLACE INJURY AND
ILLNESS PREVENTION PROGRAM**



Promoting Safe and Healthy Workplaces for California's Small Businesses

The Commission on Health and Safety and Workers' Compensation (CHSWC) | California Department of Industrial Relations

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Table of Contents

Introduction to This Guide	4
The Worker Occupational Safety and Health Training and Education Program (WOSHTEP)	5
Overview of Cal/OSHA’s Injury & Illness Prevention Program (IIPP) Standard	6
Using WOSHTEP’s Model Injury and Illness Prevention Program (IIPP) for Small Business	7
1. Assignment of Responsibilities	8
2. Hazard Assessment / Inspection	10
3. Investigation of Accidents, Injuries and Illnesses	11
4. Hazard Correction.....	12
5. Communication with Employees about Safety.....	13
6. Employee Health and Safety Training	15
7. Employee Compliance with Safety Procedures.....	16
8. Recordkeeping and Documentation	17
Making Your IIPP an Active Plan	18
Appendix A: Title 8, Section 3203, Injury and Illness Prevention Program Standard	19



Introduction To This Guide



This Guide was developed to help small businesses in California comply with Cal/OSHA's Injury and Illness Prevention Program (IIPP) standard and, consequently, protect the health and safety of their employees. It was specifically prepared for individuals who write their company's IIPP and for those who participate in its implementation. The Guide was developed to be used with an online IIPP fill-in-the-blank template and a training workshop on how to implement an effective IIPP. These resources are a component of the state's Worker Occupational Safety and Health Training and Education Program (WOSHTEP). To access the template, go to the WOSHTEP webpage at www.dir.ca.gov/chswc/WOSHTEP/IIPP. Also see this webpage for information about IIPP trainings. WOSHTEP has also developed factsheets on different health and safety topics as well as tools to help you implement your program. These factsheets and tools are highlighted throughout this Guide.

The Worker Occupational Safety and Health Training and Education Program (WOSHTEP)

The Worker Occupational Safety and Health Training and Education Program (WOSHTEP) is a statewide initiative to help workplaces in California reduce work-related injuries and illnesses among employees and comply with Cal/OSHA's Injury and Illness Prevention Program (IIPP) standard (Title 8, California Code of Regulations §3203). See the regulation in Appendix A. WOSHTEP offers free training programs, written materials and technical assistance to help build the capacity and skills of worker leaders, supervisors, small business owners and managers, and others involved in developing and implementing an effective workplace injury and illness prevention program.

WOSHTEP also has materials to help small business owners and managers train their employees about workplace safety and health issues. In addition, specific materials are available for the restaurant, janitorial and dairy industries.

For more information about WOSHTEP, contact the Commission on Health and Safety and Workers' Compensation at 510-622-3959 or one of the WOSHTEP Resource Centers. See contact information on the last page of this guide. Visit the WOSHTEP webpage at www.dir.ca.gov/chswc/WOSHTEP. For information about the IIPP materials and training, contact LOHP or the University of California Berkeley at 510-643-8902.



Overview of Cal/OSHA's Injury & Illness Prevention Program Standard

Every employer in California is required by Cal/OSHA to establish, implement and maintain a written Injury and Illness Prevention Program (IIPP). This written plan must describe your workplace's health and safety program and how you will implement the following eight elements that are required by the Cal/OSHA standard:

- Assignment of the responsibility for safety
- Investigation of accidents, occupational injuries and occupational illnesses
- Assessment of workplace hazards
- Correction of hazards
- Communication with employees and methods for involving them in safety-related activities
- Occupational safety and health training
- Systems for ensuring employee compliance with safety procedures
- Recordkeeping and documentation of your program and program activities.¹ The Cal/OSHA IIPP standard is contained in Title 8 of the California Code of Regulations, Section 3203 (T8 CCR §3203). A copy of the standard is attached (Appendix A).

¹ Please note that while all employers must have a written IIPP, there are some exceptions to the recordkeeping requirements (see footnote on page 16 of this Guide).



Using WOSHTEP's Model IIPP Program for Small Business



Developing an effective Injury and Illness Prevention Program (IIPP) involves setting health and safety goals, assigning the right people to be in charge, and then coming up with a plan that complies with Cal/OSHA requirements while meeting the individual needs of your workplace. Decide 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. Put this plan in writing.

Keep a copy of the written program in a central location and make sure all employees know where the written program is and how the elements of the program are carried out in your workplace. You should regularly review and update your IIPP in order for it to remain effective. Cal/OSHA assesses whether workplaces have “living programs” — ones that are actively implemented and routinely updated as needed.

You can use WOSHTEP's electronic, online Injury and Illness Prevention Program (IIPP) template to help you document the elements of your program. Go to the WOSHTEP webpage at www.dir.ca.gov/chswc/WOSHTEP/IIPP to access the template. Use this template (or other form if you prefer) to document how you will carry out the requirements of each element. Factsheets and tools mentioned in this Guide are also available on this web page.

The following sections describe steps to take to establish and implement your IIPP.

Using the Template

If you are in charge of writing your company's Injury and Illness Prevention Program, open the IIPP template on www.dir.ca.gov/chswc/WOSHTEP/IIPP and let's get started. The form is in Microsoft Word.

Start by typing in your business's name and address and your own name and contact information.

Items that are already checked on the IIPP template are required by the Cal/OSHA IIPP standard.

Assignment of Responsibilities

Identify Your Workplace's IIPP Administrator(s) and Assign Responsibilities

An essential first step to developing your Injury and Illness Prevention Program (IIPP) is identifying the individual who will be in charge of safety for your business and establishing that person's roles and assignments. This person must be identified by name in your written IIPP. Make sure this individual is someone who is knowledgeable about your business's health and safety issues and hazard control measures. This individual, who has the authority and responsibility for your business's safety and health program, must be given full support by management. Let all employees know who is in charge of safety for your company.

Using the Template

On your template, type in the name of the IIPP administrator. Also indicate what responsibilities the administrator will have regarding worker safety for your workplace.





Determine Who Can Help You Develop and Implement Your Program

There are many individuals, both within your workplace as well as outside resources, who can be called upon to help you develop and implement your workplace IIPP. Internally, these include workers with a leadership role, department supervisors, and the union, if there is one. Outside resources include risk managers and health and safety specialists from your insurance company, staff at the WOSHTEP Resource Centers, and consultants from the Cal/OSHA Consultation Service.



Investigation of Accidents, Injuries and Illnesses

Although the goal is to prevent injuries, illnesses and exposures before they occur, when accidents or near misses do occur, they can provide a good opportunity to identify health and safety problems and target prevention efforts. Accident investigations should be conducted by trained supervisory or managerial personnel and with the primary focus of understanding why the incident or near miss occurred and what actions can be taken to prevent recurrence. It is also a good idea to have workers participate in these investigations. Your investigation report must be in writing and adequately identify who was injured, the names of any witnesses, and the cause(s) of the incident or near miss. It should also include a description of the underlying factors that may have contributed to it and what can be done to prevent the incident in the future. See the WOSHTEP factsheet, *Underlying Causes of Injury and Illness*, for more information.

WOSHTEP Tool 1, *Investigation of Accidents, Injuries and Illnesses*, can help you to document your incident investigations. Factsheets and tools are available at www.dir.ca.gov/CHSWC/WOSHTEP/IIPP.

Using the Template

The template lists common steps involved in conducting an accident, injury or illness investigation, some of which are required. Make sure your investigation includes these steps. Check and describe any additional practices used by your workplace.

Hazard Assessment / Inspection

All businesses must have a system in place for periodically assessing the work environment for health and safety hazards that can cause injuries and illnesses. Assessing hazards can be accomplished by conducting regular inspections of each work area to learn what hazards exist and the conditions, equipment and procedures that are potentially dangerous. It is also helpful to ask employees for their ideas about potential hazards, whether they are experiencing symptoms of work-related problems, and for any suggestions for solving safety issues.

For more information about common health and safety hazards in your workplace, see the [WOSHTEP factsheet, *Understanding Job Hazards*](#). WOSHTEP also has a sample inspection checklist ([WOSHTEP Tool 2, Inspection Checklist](#)) to assist you in identifying potential hazards in your work environment. For answers to technical questions about work-related health and safety issues, contact WOSHTEP staff at one of the Resource Centers and/or Cal/OSHA Consultation Service. See the [WOSHTEP Resource List](#) for contact information.

Using the Template

On your template, write in who will be responsible for conducting inspections and check the boxes indicating when these inspections will be conducted.

The required schedule for inspections is already checked. You also have the option of conducting inspections at other times. Type in any other times your workplace will conduct





Hazard Correction

Once hazards are identified, they must be addressed in a timely manner. You need to establish a system for correcting hazards which includes the policy that whenever an imminent hazard is found that can't be immediately corrected, all exposed employees will be immediately removed from the area. You also must ensure that any employees who are addressing hazards have the proper training and equipment.

There are various methods that can be used to protect workers from hazards. Some approaches are more protective than others. The most effective solutions are those that actually **remove the hazard** (for example, substituting non-toxic cleaning chemicals for toxic chemicals, having a machine do a hazardous job instead of an employee, using a ventilation system). If the hazard can't be removed altogether, establishing **policies and procedures** that limit exposure to a hazard can help reduce the risk (for example, using two people to lift a heavy object).

Personal protective equipment (such as goggles, respirators, gloves, non-slip shoes) are worn on the body to protect the worker from being directly exposed to the hazard and in some cases, may be necessary. However, where possible, it is best to use the most effective solution possible. Often, a combination of methods is needed to get the best protection. See the [WOSHTEP factsheet, *Controlling Hazards*](#), for more information.

[WOSHTEP Tool 3, *Hazard Correction Tracking Form*](#), can help you keep track of the health and safety problems you've identified and your plans for addressing these problems.

Using the Template

On your template, both items in the Hazard Correction section are required and should be checked. Also indicate which hazards are present in your workplace. Attach your plans/ policies for addressing these hazards.

Communication with Employees about Safety

Communicate with Employees about the Health and Safety Program and Their Responsibilities

Your program must include a system for communicating with employees and involving them in your Injury and Illness Prevention Program (IIPP). Communicating with employees can take place through trainings, meetings, announcements, email notices, memos, newsletters and/or through the activities of a health and safety committee. Communication systems must include all affected employees and be in a language and manner that they understand.

All employees must be informed about your IIPP and how it is being implemented as well as their responsibility to comply with the workplace's occupational safety and health procedures. Your safety communication system must also include a method for encouraging employees to report potential hazards in the work environment without fear of reprisal.

Establish a Health and Safety Committee

While Cal/OSHA's IIPP standard does not require employers to establish health and safety committees, it is highly recommended as a way of involving employees in safety and implementing an effective health and safety program. Establishing a health and safety committee can also help you meet the communication requirements of the IIPP standard. If you establish a health and safety committee to meet the communication requirements of the IIPP standard, your committee must include both wage/hourly worker representatives and managerial representatives. The committee must also meet regularly (at least quarterly) to plan, implement and evaluate your IIPP. For information about establishing an effective health and safety committee, see the [WOSHTEP factsheet, *Health and Safety Committees*](#).

Using the Template

On your template, the required practices with respect to communicating with employees about safety have been checked. Type in any other methods you use to communicate with employees about safety. Also type in an explanation of your system for how employees can report potential hazards in the work environment without fear of reprisal.

Employee Health and Safety 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. An effective Injury and Illness Prevention Program includes training for both supervisors and employees, in a language and manner they understand. Make sure your training program reaches all affected employees and that it covers all relevant topics. Employees assigned non-routine tasks must be provided with additional training about any health and safety issues related to these tasks.

What Health and Safety Training is Required?

The IIPP standard requires that training be provided to all workers on the hazards in their workplace when they start working for their employer, whenever they are given a new job assignment, and whenever new procedures and equipment are introduced.

Another Cal/OSHA training standard that affects most workers is Cal/OSHA's Hazard Communication Standard which defines required training for workers exposed to chemicals. To find out which training requirements affect your employees, go to www.dir.ca.gov/dosh/dosh_publications/TrainingReq.htm, or contact the WOSHTEP Resource Centers.

How Should Health and Safety Training be Conducted?

You may need outside professionals to help you develop and conduct your required training program. Help is available from the Commission on Health and Safety and Workers' Compensation (CHSWC), the Labor Occupational Health Program (LOHP) at UC Berkeley, the Labor Occupational Safety and Health (LOSH) Program at UCLA, the Western Center for Agricultural Health and Safety at UC Davis, the Cal/OSHA Consultation Service, your workers' compensation insurance carrier, private consultants, and vendor representatives. Use [*WOSHTEP Tool 4, Employee Training Record*](#), to monitor which employees have had health and safety training, the dates of training, and the topics covered. Cal/OSHA does not consider video- or computer-based training to be effective unless it includes the opportunity to ask questions of an instructor during the training.

Using the Template

On your template, you will see that training is required in many situations, such as when the IIPP is first established. These required times are already checked. Add in any additional times you plan to conduct training as well as the topic areas your training covers. Add a description of how your training is conducted and who delivers your training.



Employee Compliance with Safety Procedures

Establishing health and safety rules and work procedures is an important step in developing your IIPP. Involving employees in creating these rules and procedures can ensure that they are reasonable and practical.

Make sure that clear safety procedures have been developed for each occupation in the workplace and include rules for safely handling any new health or safety hazards that are introduced into the work environment. All rules and procedures should be periodically reviewed and updated to make sure they reflect current conditions.

The IIPP standard requires that employers establish a system for ensuring that employees follow safety rules. This system must include informing employees about the provisions of your IIPP and the safety procedures to be followed. It must also include a method for providing positive recognition of employees who perform safe and healthful work practices and for fairly and consistently disciplining employees who fail to follow safety rules. Make sure the system your workplace creates does not discourage employees from reporting their injuries or symptoms. Programs that reward employees for a number of days without an injury are **strongly discouraged by Cal/OSHA** because they can be a disincentive to report injuries or early symptoms of a health problem. Early reporting of symptoms of musculoskeletal disorders and other work-related problems can help you address hazards before they cause more serious injuries.

If safety rules aren't followed, it's helpful to review procedures to see if they are practical and achievable and to consider whether any revisions are needed. It is also important to retrain employees whose safety performance is deficient before beginning the disciplinary process.

Using the Template

On your template, the required practices with respect to employee compliance are noted with check marks. Check any additional practices and type in descriptions of how the workplace will ensure compliance with health and safety procedures, including your system for recognizing employees who follow safe work practices.



Recordkeeping and Documentation

Workplaces must maintain a written IIPP and documentation of how the elements of their IIPP are carried out (there are some exceptions to the recordkeeping rules)¹. Maintaining such records can help you be more efficient and effective in implementing your IIPP.

Recordkeeping can enable you to learn from past experience, identify patterns of injury and illness and help target prevention efforts. Records can also help you document your successes, such as lower rates of injuries and incidents and correction of health and safety problems. Cal/OSHA will review your records during its inspections to ensure they are complete and accurate.

It is recommended that the following records be kept to document the elements of your program. These records are required if your workplace has 10 or more employees.

1. **Worksite inspections.** Records of scheduled and periodic inspections to identify unsafe conditions and work practices should include the name of the person(s) conducting the inspection, the hazards identified and the action taken to correct the unsafe hazards.
2. **Documentation of safety and health training provided to employees.** The documentation must include employee names, training dates, type(s) of training and the name of the training provider.

¹ Workplaces with fewer than ten workers, including managers and supervisors, only need to maintain inspection records until the hazard is corrected and a log of instructions is given to workers about their job assignments when they are first hired or assigned new duties. Local government entities are not required to keep written records of the steps taken to implement and maintain their IIPP.

Using the Template

On your template, check what records are kept by your workplace. Also type into your IIPP form where copies of this IIPP will be located, including the master copy.

It is recommended that the following additional records be kept:

3. **Injury and illness records.** During the year, regularly review these records to see where your injuries and illnesses are occurring. Look for any patterns or recurring situations. These records can help you identify hazardous areas in your workplace and pinpoint where immediate corrective action is needed.
4. **Records of accidents, injuries, and "near misses."** Serious injuries and illnesses are required to be reported to Cal/OSHA within 8 hours of when the employer finds out about the injury. Serious injuries and illnesses include fatalities, in-patient hospitalizations longer than 24 hours for other than medical observation, loss of any body part, or a serious degree of physical disfigurement.
5. **Records of employee exposures to such substances as chemicals, lead and asbestos.** Include the sources of exposure and any physical examination reports, employment records, and other information. Employers using any regulated carcinogens have additional reporting and record keeping requirements. See Title 8 of the California Code of Regulations for details.





Making Your IIPP an Active Plan

When Cal/OSHA inspects a workplace for compliance with the IIPP standard, they are looking for three things:

1. Have you established your IIPP?
2. Are you implementing your IIPP?
3. Are you maintaining your IIPP?

All workplaces, regardless of size, are required to create an IIPP. Even if your business is very small (fewer than 10 employees), you still need to identify the hazards in your workplace, decide what steps you will take to protect your employees, and communicate with your employees about the safety issues in your workplace. But it isn't enough to just have a written IIPP plan. Programs that are written but then sit on a shelf without anyone knowing about them are not effective programs. Cal/OSHA assesses whether the IIPP is actually being effectively implemented.

Cal/OSHA also wants to see that your IIPP is being maintained. This means updating your plan on a regular basis, as appropriate. Remember, Cal/OSHA is looking for "effective" programs so if your operations change or new hazards are introduced, you may need to update your program more frequently.

Appendix A: Title 8, Section 3203

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, and for any 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 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 subsection (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;
 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.



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